

## The Planning Process

### *The Consolidated Plan Was Developed Largely as an Outgrowth of On-Going Planning Efforts*

The US Department of Housing and Urban Development (HUD) requires governments that receive HUD dollars to prepare a comprehensive plan every five years. The plan must specify what the community's needs are, what strategies it plans to use in meeting those needs, what specific objectives will be used, and what programs will be funded in the first year. In each subsequent year of the plan, the city must indicate which of its objectives are being modified, if any, and what programs will be funded. Cincinnati submitted a complete Consolidated Plan to HUD in 1995, and has submitted an Action Plan for subsequent years funding. A new Five-Year Plan is due for 2000-2004.

### Funding for the Consolidated Plan

#### Community Development Block Grant

The Community Development Block Grant (CDBG) is a formula grant from the federal Department of Housing and Urban Development (HUD) to local and state governments. The primary objectives of the CDBG program are to benefit low- and moderate-income people or aid in the prevention or elimination of slums and blight. CDBG funds are a flexible resource that can be used for a wide range of programs or projects within a broad framework of eligible activities. Seventy percent of CDBG expenditures must benefit low- and moderate-income persons.

Cincinnati's 1999 CDBG budget totaled \$21,705,000, with \$16,672,000 of that amount coming from new grant funds and the balance from program income and prior year funds. Multiple City departments as well as community nonprofit agencies utilize CDBG funds to carry out program objectives. CDBG can be used to fund a wide variety of activities including:

- Rehabilitation of residential housing, both rental and owner-occupied properties.

- Rehabilitation or new construction of public facilities and improvements, including but not limited to streets and other infrastructure, parks, recreation facilities, community or health centers, facilities delivering human services operated by private non-profit agencies, and shelters serving the homeless or other special needs populations.
- Acquisition, disposition, or demolition of properties for a CDBG-eligible activity.
- Public services which are new or provide an increased level of service over that which has been provided by the local government in the preceding 12 months. All public services in the CDBG program in any given year may not exceed 15 percent of the total entitlement grant amount.
- Relocation payments when required pursuant to CDBG regulations or as determined appropriate by the grantee.
- Special economic development activities including the acquisition, construction or rehabilitation of commercial or industrial property when carried out by the recipient or by public or private nonprofit organizations.
- Assistance to private for-profit businesses including grants, loans, loan guarantees, and technical assistance. The assistance must meet certain underwriting and public benefit standards.

CDBG funds may not be used for buildings used for general government purposes; equipment; operation, maintenance and staffing of normal community services and facilities not specifically related to other block grant-funded projects; or regular government expenditures.

City Council has established the following priorities for the use of CDBG funds:

- **Housing:** A primary objective for the use of CDBG funds by the City of Cincinnati is to serve its communities by providing decent housing and a suitable living environment to low and moderate-income persons. A large amount of CDBG funds are spent on providing or improving permanent residential structures through the City's Department of Neighborhood Services. Neighborhood Services provides a variety of services to both very low and low-income homeowners and renters. Most of these programs have been made available to eligible clients on a citywide basis rather than focusing on certain neighborhoods.
- **Economic and Job Development:** CDBG funds provide loans, grants, public improvements and technical assistance to businesses and industries to expand or consolidate their operations within Cincinnati, providing jobs for low and moderate income persons or goods and services for low and moderate income

neighborhoods. CDBG funds are also used for job training, job referral, and other workforce development activities through the City's Employment and Training Division. The Department of Economic Development is primarily responsible for the City of Cincinnati's economic development programs.

- Human Service: CDBG funds are provided through the Human Services section of the Neighborhood Services Department to provide needed public services, primarily programs for at-risk youth. CDBG funds are also provided to social service agencies to rehabilitate their service-delivery facilities. Human service facility projects can address correction of code violations, removal of architectural barriers that restrict mobility and accessibility, energy conservation or historic preservation. CDBG funds are not used for the acquisition or new construction of human service facilities. Agencies are expected to match the City's funds through private fund raising efforts, and to have their match in place at the time of construction.

HOME Investment  
Partnerships  
Program

The HOME Investment Partnerships Program is a formula grant that funds affordable housing programs. HOME funds can be used for acquisition, construction, reconstruction, and moderate or substantial rehabilitation activities that promote affordable rental and ownership housing. They can also be used for tenant-based rental assistance. Cincinnati uses HOME funds primarily for the rehabilitation of rental housing units for low-income families, and for homeowner rehabilitation and the promotion of new home ownership opportunities. The Department of Neighborhood Services administers HOME funds. The 1999 federal HOME grant is \$4,796,000.

Housing  
Opportunities for  
Persons with AIDS  
(HOPWA)

HOPWA funds may be used to assist all forms of housing designed to prevent homelessness of AIDS victims, including emergency housing, shared housing arrangements, apartments, single room occupancy dwellings, and community residences. HOPWA funds also may be used to fund services, such as health care and mental health services, drug and alcohol abuse treatment and counseling, intensive care, case management, assistance with daily living and other supportive services. Cincinnati's 1999 HOPWA grant amount is \$395,000.

Cincinnati became a HOPWA grantee for the first time in 1998. The Eligible Metropolitan Statistical Area (EMSA) includes 12 counties in three states. The Department of Neighborhood Services administers the grant. Eligible activities include:

- Housing information services
- Project-based or tenant-based rental assistance
- New construction of a community residence or SRO dwelling
- Acquisition, rehabilitation, conversion, lease or repair of facilities to provide housing and services

- Operating costs for housing
- Short-term rent, mortgage and utility payments to prevent homelessness
- Supportive services
- Administrative expenses (limited to 7% of total request).
- Resource identification and technical assistance.

#### Emergency Shelter Grant (ESG)

The Emergency Shelter Grant (ESG) Program is a formula grant that can fund both the capital and non-staff operating needs of emergency shelters and transitional housing for the homeless. Outreach or supportive services for the homeless are also allowable uses of funds. Every ESG dollar must be matched by a dollar of other funding. Cincinnati's 1999 ESG grant amount was \$591,000. The Department of Neighborhood Services administers ESG funds. Eligible activities include:

- Renovation, major rehabilitation or conversion of building for use as emergency shelters for the homeless.
- Provision of essential services to the homeless (subject to limitations)
- Payment for shelter maintenance, operation, rent, repairs, security, fuel, equipment, insurance, utilities, food and furnishings.
- Homeless prevention activities
- Administrative costs

#### Total Budget

Following is a summary of the total budget to be allocated under the Consolidated Plan. Congress has not yet determined HUD's budget for 2000.

<b>Program</b>	<b>1999</b>	<b>Expected 2000</b>
CDBG (including program income)	\$21,705,126	\$21,170,000
Home	\$4,796,000	\$4,440,000
ESG	\$591,000	\$450,000
HOPWA	\$395,000	\$395,000 <sup>1</sup>

#### Other Funding Affected by Consolidated Plan

The Consolidated Plan specifies how approximately \$26 million in federal funding will be spent next year in Cincinnati (and, it is reasonable to assume, in each of the subsequent four years). However, there are other reasons why the Consolidated Plan is important.

<sup>1</sup> There are some unspent HOPWA funds from previous years that will be allocated for 2000.

- The Cincinnati Metropolitan Housing Authority (CMHA) receives a variety of federal grants for such purposes as new Section 8 subsidies and drug elimination programs. The biggest of these awards recently have been two HOPE VI awards for the demolition and reconstruction of two areas of the West End of Cincinnati: Laurel Homes and Lincoln Court. HUD requires that all of these projects be consistent with the City's Consolidated Plan.
- The City of Cincinnati and Hamilton County now jointly coordinate the planning and allocation process known as the Continuum of Care, which determines how competitive grant funds for the homeless are spent. Those funds are in addition to the funds described above, and flow directly from HUD to the providers. Nevertheless, those funding decisions must also be consistent with the Consolidated Plan.
- All federal funding applications made to HUD for area housing programs to be operated in Cincinnati, over and above the specific programs listed in the plan, must be certified as being consistent with the Consolidated Plan, regardless of whether they are operated by non-profits, CMHA or the City.
- A large variety of not-for-profit organizations are engaged in housing and community development projects that are affected by what the City does, what it chooses to fund, and what it chooses not to.
- City funding has the potential to change private investment revenue streams.

Thus, while the Consolidated Plan must spell out how millions of dollars of HUD funding will be spent, many million more dollars also ride on the plan.

## Participants in Plan Development

### City of Cincinnati

City Council sets housing policy and makes final funding decisions for CDBG, HOME, ESG and HOPWA funds.

The City of Cincinnati Office of Budget and Evaluation is the lead agency for the Consolidated Plan. The Office was responsible for all aspects of coordinating the development of the plan.

The Department of Neighborhood Services is the City's principal housing agency and, as such, is responsible for implementing the housing production programs that use CDBG and HOME funds. The Department also receives a CDBG allocation for facilities renovation, which may or may not regard housing, and administers the Emergency Shelter Grant Program. Finally, the department administers the HOPWA funds awarded to the Cincinnati EMSA.

The Department of Economic Development administers several programs to assist commercial and industrial developments throughout the city. The Department also works closely with neighborhoods and small businesses, with an emphasis on those that are minority-owned or women-owned. Small businesses are assisted by several financial assistance and incentives. The Department administers several Federal, State and local programs to provide assistance in the form of loans, tax incentives and grants.

The Employment and Training Division provides training, retraining and employment skills development programs and services to disadvantaged adults and youth and other unemployed persons. The major programs of the Division include JTPA programs, the Employment Initiative Program, and the Cincinnati Career Education Academy (CCEA).

The Buildings and Inspections Department is responsible for code enforcement in selected neighborhoods and to ensure quality assurance of City-assisted rehabilitation work.

The Cincinnati Planning Commission is actively involved in community-based planning and in providing technical assistance to neighborhood planning.

#### Other Public Institutions

The Cincinnati Metropolitan Housing Authority (CMHA) provides publicly subsidized housing for persons with low and moderate incomes. It operates public housing developments, scattered site developments and voucher/certificate programs that allow tenants to choose their own housing and location.

Hamilton County jointly operates the local Continuum of Care Planning process with the City of Cincinnati. The county's Department of Community Development operates a Section 8 program and many of its clients find housing inside the City of Cincinnati.

The State of Ohio offers housing funding and technical assistance through the Department of Development and through the Ohio Housing Finance Authority. These departments and Cincinnati frequently cooperate in funding projects.

#### On-Going Venues for Citizen Input

The City of Cincinnati has a number of avenues for citizen input into on-going planning activities that contributed significantly to the development of the Consolidated Plan.

#### Neighborhood Planning

To identify neighborhood needs, the City asks its fifty-one community councils what their priorities are for the City Budget on a biennial basis. The City uses teams of staff persons known as Cincinnati Neighborhood Action Strategy Teams to assist neighborhoods with this process. The City then considers these priorities in putting together its Operating, Capital and Consolidated Plan budgets.

#### Continuum of Care

Annually, the City of Cincinnati and Hamilton County jointly sponsor a professionally facilitated Continuum of Care process that includes the Hamilton County Community Development Department and the Greater Cincinnati Coalition for the Homeless. Participating are nonprofit providers of housing and services, state and local governments and agencies, private sector representatives, housing developers, foundations and other community organizations, as well as homeless or formerly homeless persons. The outcome of the process is an application for Continuum of Care Homeless Assistance funding in which the participants reach a consensus on the needs, gaps, and relative priorities for grant funding. The process also results in an annual evaluation of the projects eligible for renewal.

#### Empowerment Zone Planning Committee

The City's newly designated Empowerment Zone (December 1998) was the result of a community-driven process. The Cincinnati Empowerment Corporation (CEC) – a 33-member board with equal representation from the business community, government and non-profits, and community stakeholders – is managing implementation of the plan. To date, the CEC has completed its 1999 Annual Report and is finalizing its bylaws and Code of Regulations. An agreement governing the flow of federal funds through the City of Cincinnati to the CEC is nearing approval.

#### Fair Housing Committee

The Fair Housing Committee is comprised of more than 40 members representing various community organizations, not for profit housing developers, realtors, bankers, city and county administrators, civil rights organizations, religious associations, and higher education professionals. The committee meets on a regular basis to discuss identified impediments to fair housing within Hamilton County, to review existing City, County, State and Federal housing policies and programs, and to make recommendations for new policies in pursuit of fair housing.

#### HOPWA Advisory Committee

Since the City of Cincinnati became a HOPWA entitlement grantee in 1998, the City has utilized an advisory committee comprising representatives of the principal agencies serving persons with HIV/AIDS as well as representatives of advocacy groups within the twelve county Eligible Metropolitan Statistical Area (EMSA). The Advisory Committee makes its recommendations to the City Manager and, for Consolidated Plan program recommendations, to the Community Development Advisory Board (CDAB).

#### Brownfields Advisory Committee

The City of Cincinnati and Hamilton County are in the process of setting up a Brownfields Community Advisory Committee (BCAC). The BCAC will consist of representatives of government, business, industry, environmental groups and affected neighborhoods and enterprise zones within the Mill Creek Valley. The committee will advise the Port Authority on brownfield redevelopment issues and serve as the communication link with the community. The BCAC will work with Port Authority

staff to determine preliminary criteria for site selection, formulate a preliminary list of potential redevelopment sites, help develop action plans for specific sites, recommend incentives to be used to encourage new companies to hire local people and to incorporate environmental improvements and amenities as part of the redevelopment process.

#### Human Services Advisory Committee

The Human Services Advisory Committee (HSAC) advises the City on the allocation of funds for human services activities, both from the Community Development Block Grant and from a General Fund set-aside. In collaboration with the Cincinnati Coalition for the Homeless, it also advises on the allocation of resources for emergency shelter and transitional housing provided by Community Development Block Grant and Emergency Shelter Grant funds. The HSAC makes its recommendations to the City Manager and for Consolidated Plan program recommendations, to the Community Development Advisory Board (CDAB). Agencies with proposals for funding are asked to prepare applications in the spring of the year for review and recommendation by mid-summer.

#### Neighborhood Business Districts

Proposals for funding for neighborhood business district (NBD) improvements are made through a special process of the Economic Development Department. Request-For-Proposal packages are mailed to community leaders in early March. The Cincinnati Neighborhood Business Districts United (CNBDU), an association of NBD members, reviews NBD proposals. Their recommendations are made to the Department of Economic Development, which in turn requests funding from CDBG or City Capital resources.

#### Community Development Advisory Board

The Community Development Advisory Board (CDAB) reviews all proposed expenditures in each annual Consolidated Plan budget. The CDAB is a volunteer citizen's group appointed by the Mayor and advisory to the City Manager. Its members include neighborhood representatives, lenders, developers, representatives of neighborhood business and other community organizations.

#### Community Planning Sessions

In order to obtain expert advice on the development of the Consolidated Plan and to identify issues involving the coordination of activities, seven community planning sessions were held in late September and early October of 1999. Invitees included a wide variety of individuals and organizations who have been funded by the City, who collaborate with the City, and who work on problems related to those addressed by the plan. Each session was professionally facilitated and addressed a distinct topic. At the beginning of each session, data from Part 1 of the Plan (as it existed in draft form) was presented and participants were invited to add to this material their own data and insights into the state of the City. Following that, strategies and objectives used by the City in the past were summarized and participants were invited to criticize previous efforts and propose new directions for efforts in the future. In the areas of



homelessness and housing, where HUD requires that priority needs be identified, these sessions were used to develop those priority needs.

One hundred fifteen people representing 75 organizations participated in one or more of these sessions. Participating organizations included the city and county, non-profit housing developers (renter and owner), economic development specialists, shelter and transitional housing providers, a range of special needs and homeless service providers, for-profit developers, community lending institutions and banks, fair housing advocacy groups, legal service providers, homeless advocacy and organizing groups, community group, public housing residents, formerly homeless persons and neighborhood leaders. The participants are listed below.

#### Homelessness

<b>Organization</b>	<b>Attendee</b>
Anna Louise Inn	Gretchen Wilson
Bethany House	Kevin Lab
Caracole, Inc.	Diane Morshauser
Caracole, Inc.	Sue Butler
Center for Comprehensive Alcohol Treatment	Sandra Keuhn
Center For Independent Living Options	Cathy Miller
Center For Independent Living Options	Suzanne Hopkins
Center For Independent Living Options	Trish Brodrick
Chabad House Shelter	Fannie Johnson
Cincinnati Community Development Advisory Board	Bernice Marshall
Cincinnati Community Development Advisory Board	Joyce Asfour
Cincinnati Public Schools - Project Connect	Debbie Reinhart
Cincinnati Public Schools - Project Connect	Loni Sander
City of Cincinnati-Budget & Evaluation	Carl Gill
City of Cincinnati-Budget & Evaluation	Lois Logan
City of Cincinnati-Neighborhood Services	Mark McComas
Drop Inn Center	Pat Clifford
Excel Development Company	Jim Frasca
First Step Home	Jennifer Basden
Greater Cincinnati Coalition for the Homeless	Donald Whitehead
Greater Cincinnati Oral Health Council	Clifford Jones
Greater Cincinnati Oral Health Council	Larry Hill
Health Resource Center	Libby Earll
Interfaith Hospitality Network	Rod Heilman
Joseph House	Bill Malone
Joseph House	Mike Lisbeth
Justice Watch	Suhith Wickrema
Lighthouse Youth Services	Donna Howard
Mercy Franciscan at St. John	Nafisa Wali
Mercy Franciscan Home Development	Annette Miller
Mercy Franciscan Home Development	Linda Fox

Mercy Franciscan Home Development	Stephanie Sweeney
Mount Airy Shelter	Jackie Jordan
Ohio Valley Goodwill Industries	Charlie Blyth
Ohio Valley Goodwill Industries	John Briggs
Salvation Army	Jane Mynatt
Talbert House	Cassandra M. Cerneglia
Tender Mercies	Eric Fouche
YWCA	Deborah Brooks
City of Cincinnati-Neighborhood Services	Carol Brown

### Special populations

<b>Organization</b>	<b>Attendee</b>
AIDS Volunteers of Cincinnati	Victoria Brooks
Caracole, Inc.	Diane Morshauser
Center for Comprehensive Alcohol Treatment	Sandra Keuhn
Center For Independent Living Options	Cathy Miller
Center For Independent Living Options	Suzanne Hopkins
Center For Independent Living Options	Trish Brodrick
Cincinnati Community Development Advisory Board	Joyce Asfour
City of Cincinnati-Budget & Evaluation	Carl Gill
City of Cincinnati-Budget & Evaluation	Lois Logan
City of Cincinnati-Neighborhood Services	Barry Schwartz
Drop Inn Center	Pat Clifford
Housing Opportunities Made Equal	Wendy Munick
Legal Aid	John Schrider
Prospect House	David Logan
Star Fire Council	Jim Rogers

### Ownership

<b>Organization</b>	<b>Attendee</b>
Bank One/CDAB	Peg Moertl
Better Housing League	Dot Christenson
Cincinnati Community Development Advisory Board	John Roth
Cincinnati Housing Partners	Sr. Ann Rene McConn
City of Cincinnati - Planning Department	K. Scott Enns
City of Cincinnati-Budget & Evaluation	Carl Gill
City of Cincinnati-Budget & Evaluation	Lois Logan
City of Cincinnati-Budget & Evaluation	Paula Knecht
City of Cincinnati-Neighborhood Services	Rochelle Thompson
Federal Reserve Bank	Candis Smith
Glacid Group	John F. Glaser III
Housing Opportunities Made Equal	Jonathan W. Williams
Neighborhood Housing Services	Kristine Ritchie
North Fairmount Community Council	Lois A. Broerman

People Working Cooperatively  
PNC Bank

Richard Castellini  
Renee MaHaffey-Harris

## Renters

<b>Organization</b>	<b>Attendee</b>
Access Property Management	Barry Miller
Anna Louise Inn	Gretchen Wilson
Cincinnati Community Development Advisory Board	Bernice Marshall
Cincinnati Metropolitan Housing Authority	Donald Troendle
City of Cincinnati-Budget & Evaluation	Carl Gill
City of Cincinnati-Budget & Evaluation	Lois Logan
City of Cincinnati-Neighborhood Services	Jocelyn Van Coney
Coalition for Housing & Homelessness in Ohio	Jill Russ
Drop Inn Center	Pat Clifford
Greater Cincinnati Housing Alliance	Deborah Jimmerson
Greater Cincinnati/N. KY Apartment Association	Charles Tassell
Hart Reality, Inc.	Tim Morning
Hart Reality, Inc.	Tom Denhart
Housing Opportunities Made Equal	Bill Berger
Preserving Affordable Housing, Inc.	Margo Aug
Provident Bank	Bob Alexander
U.S. Dept. of Housing & Urban Development	Elizabeth E. Brown
Wichman Gunther Architect	James D. Wichman

## Public Housing and Section 8

<b>Organization</b>	<b>Attendee</b>
Cincinnati Community Development Advisory Board	Ernie Waits, Sr.
Cincinnati Metropolitan Housing Authority	Beulah M. Hanry
Cincinnati Metropolitan Housing Authority	Debra Forte-Muhammad
Cincinnati Metropolitan Housing Authority	Donald Troendle
Cincinnati Metropolitan Housing Authority	Douglas Conner
Cincinnati Metropolitan Housing Authority	Lisa Isham
Cincinnati Police Division	Officer Ron Avant
Cincinnati Police Division	Officer Shawn George
Cincinnati Police Division	Sgt. Doug Wiesman
City of Cincinnati-Budget & Evaluation	Carl Gill
City of Cincinnati-Budget & Evaluation	Gerry Torres
City of Cincinnati-Budget & Evaluation	Lois Logan
CMHA - Section 8	Michael C. Harris
CMHA - Section 8	Sheila Fairbanks
CMHA - Security Department	Charlie Murray
CMHA -Section 8/Family Self-Sufficiency	Judy Langer
CMRAAB/Riverview	Doris Hill

Greater Cincinnati Coalition for the Homeless	Donald Whitehead
Housing Opportunities Made Equal	Karla Irvine
Legal Aid	John Schrider
Terrace Guild/CUB	Bob Littman
U.S. Dept. of Housing & Urban Development	Elizabeth E. Brown
Winton Hills Citizen Action Association	Linda Briscoe

### Neighborhood Revitalization

<b>Organization</b>	<b>Attendee</b>
Bank One/CDAB	Peg Moertl
Cincinnati Community Development Advisory Board	Clifford W. Atkinson
Cincinnati Community Development Advisory Board	Maureen Dillon
City of Cincinnati-Budget & Evaluation	Carl Gill
City of Cincinnati-Budget & Evaluation	Gerry Torras
City of Cincinnati-Budget & Evaluation	Lois Logan
City of Cincinnati-Budget & Evaluation	Paula Knecht
City of Cincinnati-Neighborhood Services	Gerard Hyland
City of Cincinnati-Neighborhood Services	Jocelyn Van Coney
City of Cincinnati-Neighborhood Services	Rochelle Thompson
City of Cincinnati-Neighborhood Services	Susan Utt
N. Fairmount Community Center	Barry Cholak
Neighborhood Development Corp. Assoc.	Barbara Milon

### Economic Development/Anti-Poverty

<b>Organization</b>	<b>Attendee</b>
African American Chamber of Commerce	Hubert Guest
Anna Louise Inn	Gretchen Wilson
Cincinnati Business Incubator	Annette Smith Tarver
Cincinnati Community Development Advisory Board	Clifford W. Atkinson
Cincinnati Community Development Advisory Board	Ernie Waits, Sr.
Cincinnati Community Development Advisory Board	Frank Fisher
Cincinnati Community Development Advisory Board	John Roth
Cincinnati Community Development Advisory Board	Maureen Dillon
Cincinnati Local Development Co.	Glenn Clevenger
Cincinnati Minority Suppliers Development Council	Arlene Taylor
Cincinnati Union Bethel	Olivia Farr
Cincinnati Works	Beth Smith
City of Cincinnati-Budget & Evaluation	Carl Gill
City of Cincinnati-Budget & Evaluation	Lois Logan
City of Cincinnati-Budget & Evaluation	Paula Knecht
City of Cincinnati-Neighborhood Services	Carol Brown
City of Cincinnati-Neighborhood Services	Jocelyn Van Coney
Department of Economic Development	Eric Denson

Department of Economic Development	Susan Paddock
Employment and Training Division	Greg Baker
Greater Cincinnati Chamber of Commerce	Randy Welker
Greater Cincinnati Coalition for the Homeless	Donald Whitehead
Hamilton County Department of Human Services	John Young
Hamilton County Economic Development	Harry Blanton
Merusi Partners	R. Scott Merusi
Minority Mentoring Program	Catherine Ingram
Ohio Bureau of Employment Services	Nancy Raimey
PREP, Inc.	Eddie Campbell
U.S. Dept. of Housing & Urban Development	Maureen F. Wood
Urban League of Greater Cincinnati	Sheila Adams

A great deal of valuable information and many important proposals resulted from these meetings. Many contributions made during the meetings were incorporated into the plan. A few examples of these are:

- Suggestions for how the City might respond to a loss of Section 8 project-based units.
- The emergence of predatory lending practices.
- The idea of trying to link newly developed housing units (either new construction or rehab) to services offered by organizations with which the City would create partnerships.

These contributions and many others are made note of in Part 3 in subsections entitled *Community Input*.

## Implementation Planning

The City of Cincinnati will implement its Consolidated Plan in partnership with the numerous not-for-profit organizations with which it works (a list of these partners for 2000 is included in Part 4 of the Plan). In addition, in planning for the implementation of the Consolidated Plan, the City has adopted the following general strategies.

- **Regionalism:** The City of Cincinnati does not have the resources to solve the region's problems on its own. Whenever possible, the City will seek to help create and participate in regional collaborations. The Continuum of Care process (jointly coordinated with Hamilton County) is a successful example of how to do this. The work of the Fair Housing Committee has not been regionalized, although the City did try to do so.

- Partnership: Compared to the costs associated with improving the City's housing and making its residents economically self-sufficient, the money to be spent under the Consolidated Plan is only a fraction of what is needed. The City has entered into an important partnership with CMHA for the redevelopment of the Laurel Homes and Lincoln Court areas of the West End. This is a good example of how the City can increase the impact of its expenditures. The plan includes other examples of partnerships being developed and partnerships that should be developed.
- Leverage: The City should be alert to the possibility that City investments can induce other organizations to make investments. Sometimes this will have to be the high profile *first-in* type of leverage, where the City announces its support of a project, thereby legitimizing it. However, if charitable donors want to pay for services and products but not for the mundane things that organizations might need to function, such as ADA-compliant bathrooms or ongoing operational costs, the City should be content to fund the mundane.
- Neighborhood Revitalization: By far the most important general strategic consideration is the linking of various investments to address the comprehensive needs of an area. None of the problems facing low and moderate-income residents of the City of Cincinnati are simple. In broad terms, the City uses HUD dollars to fund housing, economic development, human services. This plan does not change that. However, in spending those dollars, the City must strive to be more effective in linking the expenditures so that the programs have reinforcing effects. Low-income residents of neighborhoods do not just need affordable housing, they also need jobs. Too often, the City allocates one type of funding independently of the others. Neighborhood revitalization provides a framework for coordinating a comprehensive range of City investments in specific geographic areas. The Empowerment Zone, were it fully funded by HUD, would represent an example of how to conceptualize neighborhood revitalization efforts.
- Monitoring: HUD is tightening its monitoring efforts. Every funded program will have to have measurable objectives. A failure to meet an objective will raise the specter of the loss of HUD dollars. The City plans to implement a more intensive and more public process for monitoring the performance of funded programs. Citizen input will be sought in the spring or early summer, when it can influence allocation decisions for the next year.
- Targeting: The City will also take a more active role in the targeting of funds by taking steps to ensure that programs are funded that will accomplish certain objectives. Rather than reviewing and funding proposals that are submitted by its non-profit partners, the City might wish to issue calls for proposals for specific objectives. The City can take a step in this direction without committing itself wholly to this approach by identifying a small number of

objectives for which it would like to fund new approaches and issuing calls for proposals in those areas.

Targeting  
Geographic Areas  
in Need

The City recognizes the importance of geographically targeting resources. For the Empowerment Zone proposal, the City explicitly endorsed the idea of targeting high need areas for resources. The Empowerment Zone neighborhoods are working to implement a comprehensive vision of what they want their community to be like. The City intends to support the EZ because there is a shared vision for an economically and racially diverse community. The City is also aggressively targeting neighborhoods through its support of the HOPE VI projects. The neighborhoods have been deemed worthy not simply because they are concentrations of poverty, but rather because they are high poverty neighborhoods with visions of being more diverse, both economically and racially. The City does not have the resources to provide concentrated resources to all communities that represent concentrations of poverty or minority concentrations. But, as these two points illustrate, a good deal of the City's planned spending under this plan is targeted.

Aside from the Empowerment Zone and the HOPE VI projects, essentially all of the City's resources for housing to be allocated under this plan are targeted to low-income residents of the City.

With respect to homelessness and special populations, the City recognizes that services to the homeless and to members of special populations must be provided in neighborhoods and at locations that are convenient for and accessible by the persons to be served.

With respect to the Section 8 program, the City places great importance on deconcentration. As will be described in Part 3 of the Plan, the City will work to develop a coalition of organizations to counteract the possible loss of project-based subsidies. However, in doing so, the City must guard against the possibility that it will further concentrate poverty. If the City is successful in creating new locations for Section 8 housing as some existing project-based subsidies are lost, it would be far better for the new subsidies to be located in unimpacted neighborhoods than in neighborhoods which already have a high proportion of assisted rental housing.

## Citizen Response to the Plan

As part of the development of the 2000 Consolidated Plan, citizen review and comment on needs, priorities and strategies has been sought. There was a public hearing on October 7<sup>th</sup> that was advertised in mailings to its partners and in general circulation newspapers. The public announcement is shown in Attachment IV of this Plan. The hearing was held in Council Chambers in City Hall, which is an accessible facility. The public hearing concerned the proposed priorities, strategies and programs and was held before the Community Development Advisory Board.

On October 15, the City published the proposed Consolidated Plan for a 30-day comment period. The Proposed Consolidated Plan was made available for citizen review in the Clerk of Council's Office, in the Office of Budget and Evaluation, City Hall, 801 Plum Street, Cincinnati. A summary of the Proposed Consolidated Plan was mailed to Cincinnati's fifty-one community councils and to all interested parties who requested one by calling the Office of Budget and Evaluation, 352-3232, or by signing up at the public hearing.

The proposed Consolidated Plan included a summary of comments from the community planning sessions, which are available in Part 3. Further comments from citizens received during the 30-day comment period are also included in the plan, along with the City's responses, in Part 3.



## Needs and Strategies

### *The Five-Year Plan of the City of Cincinnati*

The Consolidated Plan has two components: a five year plan consisting of the strategies and objectives that will be used between 2000 and 2004 and a one year action plan that includes details about specific programs that will be funded in 2000. This part of the document presents the five-year plan. The one-year plan is outlined in Part 4.

### Homelessness

#### Vision

The Cincinnati/Hamilton County Continuum of Care process adopted this vision, which for the Consolidated Plan has been expanded to be The Cincinnati/Hamilton County Homeless Housing and Services Vision.

- Continue to maintain, develop and implement a single, coordinated, inclusive homeless assistance system.
- Support homeless persons in their movement from homelessness to economic stability and affordable permanent housing within a supportive community.
- Strive to be inclusive of all the needs of all of Cincinnati's and Hamilton County's homeless, including the special service and housing needs of homeless sub-populations.

#### Needs

The following needs represent the consensus of the participants at the community planning session on homelessness.

#### Outreach and Assessment

Providers view better assessment of client needs as critical, including the development of specialized assessment tools and support that can result in more effective case management. The Homeless Forum, a group of homeless persons convened annually as part of the Continuum of Care process to provide direct input and feedback, has

noted for the past three years that success in movement along the Continuum is based on caring, committed service providers who can knowledgeably provide assessment, referral and access information. Over the four years of COC planning, several projects have included a new assessment methodology designed to focus on specific groups (HIV/AIDS, chronic substance abuse, dual diagnosis, and physical/cognitive/sensory disabilities) and for persons who are in need of job training programs.

#### Shelters

There appear to be enough generic emergency shelter beds to accommodate persons in need. While no new shelter facilities need to be created, all existing shelter beds need to be maintained. Even in the family facilities, where the count could support a small increase in the number of beds, the conclusion was to focus attention on access and use of the current beds, and provide quicker turnover into the transitional and permanent beds, rather than to create more shelter beds. Within the men's shelters attention should be given to improving the quality of the beds.

There are two problems related to shelter capacity:

- The differing seasonal peak needs of the homeless – women and families in the early to mid-summer and men in the winter – might allow for improved service if there was some flexibility in who could use the beds at different times of the year.
- The operation of the Quick Access Beds system needs to be improved. This system represents a countywide resource that shelter providers and people who work with the unsheltered population agree is vitally important. However, the beds have been underutilized over the past year. Therefore, an analysis of how these beds are used and the procedures by which people can be placed in them needs to be carried out so that the potential of the system can be realized.

While there may be enough beds, the system still needs to improve services. The emergency shelters provide services primarily to persons with histories of poverty and chronic homelessness. High priority services to be developed or expanded over the next five years include:

- Case management
- Substance abuse treatment
- Mental health care
- Housing placement for individual homeless persons
- Case management, childcare, and housing placement for families.

The addition of these services to the continuum of existing services will provide increased opportunities for self-sufficiency for the homeless and encourage movement through the continuum. The ongoing COC process recognizes the emergency shelter system to be outstanding in terms of accessibility, referral and coordination. It further recognizes the Greater Cincinnati Coalition for the Homeless as playing an important role within the system for providing opportunities for cooperation, coordination and advocacy, thus enabling continued funding and support.

#### Transitional Housing

There is a need for an increase in program-specific and population-specific transitional housing that includes a strong service base, whether internal or coordinated via external links. Further, it is essential that all transitional housing beds currently targeted for homeless persons be maintained. The transitional housing system has a bottleneck at the discharge point of the emergency shelter system. There are at present too few options for persons to make the passage from the shelter system into transitional programs. More housing options are needed to serve members of special populations, who often are unable to move immediately from the shelter system to permanent, independent housing.

#### Permanent Housing

Another bottleneck in the continuum is at the point of access to affordable permanent housing with support services for special populations. The inventory of permanent service-enriched housing is inadequate to meet the need. An increased number of specific permanent housing units and options are critically important. In 1999, the City and Hamilton County COC process placed its greatest emphasis on the development of permanent housing resources. Development of these resources has been slowed by the HUD match requirements and lagging time frames. Only the Shelter Plus Care program has annually added new units to the local inventory. However, with the new regulatory emphasis on permanent housing, several non-profit housing developers have found new and creative ways to increase the supply of permanent housing units within the constraints of HUD funding. New programs proposed in 1999 include a scattered site rental subsidy program and additional S+C units.

#### Priority Needs

As described in Part 1, previous studies of the number of homeless persons and families in Cincinnati have not been point-in-time studies. The following results are based on research commissioned for the Consolidated Plan 2000-2004. The study had 100 percent participation by homeless housing providers and meets HUD requirements for counts of persons homeless.

In the following table, the need for emergency shelter beds was determined by adding the number of sheltered and unsheltered individuals and inflating the result by 5 percent to take into account unknown individuals. The need for transitional housing was calculated by adding together those housed, in beds committed but yet to be constructed, and adding a 30 percent inflation factor to take account of the number of

people in shelters and on the street who would benefit from transitional beds were they available. The need for permanent housing was calculated similarly.

Estimated service needs were derived based on percentages of homeless persons requiring the services. These percentages were developed through the Continuum of Care process and then applied to the total unduplicated homeless count shown in the Total Estimated Need under the Beds/Units section. The current inventory for services was determined through provider surveys.

HUD Table 1A

<b>Individuals</b>		<b>Estimated Need</b>	<b>Current Inventory</b>	<b>Unmet Need/ Gap</b>	<b>Relative Priority</b>
<b>Beds/Units</b>	Emergency Shelter	446	414	32	Low
	Transitional Housing	420	304	116	High
	Permanent Housing	527	406	121	High
	Total	1,393	1,124	269	
<b>Estimated Supportive Services Slots</b>	Job Training	697	90	607	Med
	Case Management	1,393	787	606	High
	Substance Abuse Treatment	697	214	483	High
	Mental Health Care	697	483	213	High
	Housing Placement	866	157	709	High
	Life Skills Training	1,144	214	901	Med
	Medical Services	1,363	562	761	Low
<b>Estimated Sub- Populations</b>	Chronic Substance Abusers	697	315	382	Med
	Seriously Mentally Ill	697	540	157	High
	Dually - Diagnosed	488	270	218	High
	Veterans	139	67	72	Low
	Persons with HIV/AIDS	139	45	94	Low
	Victims Domestic Violence	139	56	83	Med
	Youth	209	56	153	Med
	Phys/Cog/Sen Disability	279	191	88	Low
<b>Families</b>		<b>Estimated Need</b>	<b>Current Inventory</b>	<b>Unmet Need/ Gap</b>	<b>Relative Priority</b>
<b>Beds/Units</b>	Emergency Shelter	335	267	68	Med
	Transitional Housing	357	305	52	High
	Permanent Housing	338	201	137	High
	Total	1030	773	257	
<b>Estimated Supportive Services Slots</b>	Job Training	927	595	332	Low
	Case Management	1030	773	257	High
	Child Care	824	402	422	High
	Substance Abuse Treatment	515	240	275	Med
	Mental Health Care	340	201	139	Med
	Housing Placement	695	506	189	High
	Life Skills Training	1030	773	257	Med
	Medical Services	1030	773	257	Low
<b>Estimated Sub- Populations</b>	Chronic Substance Abusers	515	332	183	High
	Seriously Mentally Ill	340	178	162	High
	Dually - Diagnosed	258	131	126	High
	Veterans	41	8	33	Low
	Persons with HIV/AIDS	155	100	54	Low
	Victims Domestic Violence	515	410	105	Med
	Youth	155	39	116	Med
	Phys/Cog/Sen Disability	155	62	93	Low

The estimated sizes of subpopulations of homeless persons were based on standard recognized percentages of homeless sub-populations as applied to the total unduplicated homeless count shown in Total Estimated Need under the Beds/Units section. The current inventory was estimated by applying the percentage of actual subpopulations as determined by provider surveys during the point-in-time count.

Participants in the planning process completed the relative priority ratings individually prior to the meeting. The group discussed the results and made some modifications to the relative priorities within the gaps analysis chart. Participants were asked to make judgments based on their direct experience with the homeless community and previous planning work in which they were involved.

#### Strategy

In keeping with the vision of the community, three comprehensive strategy statements were developed from the Continuum process:

- Maintain the current number of beds and units within the Continuum of Care for both homeless individuals and families.
- Focus development or expansion efforts on permanent housing and, to a lesser degree, on transitional living facilities for the homeless.
- Encourage maximum participation, training, evaluation, technical assistance and quality standards within the COC for all homeless programs.

In addition to accomplishing the programmatic objectives presented next, the City of Cincinnati, in collaboration with Hamilton County, should continue to encourage maximum participation in the Continuum of Care (COC) process through the following actions:

- Support participation in the process by homeless persons.
- Maintain quality process standards.
- Maintain a standard policy within the homeless funding processes (ESG and Continuum of Care) that requires proof of non-profit status and auditability prior to application or inclusion in the ranking processes.
- Maintain the requirement that the Greater Cincinnati Coalition for the Homeless certifies all shelter and transitional housing facilities as having met Minimum Standards prior to application for ESG or CDBG funding.
- Continue to convene, train and support homeless service and housing providers within the COC process.
- Continue and improve the process for self and community evaluation of existing programs prior to funding renewal.

Also, as part of its Human Services Policy, the City's first priority for services is to support services that meet basic emergency human needs. Therefore, the City proposes to continue its support of emergency and homeless services using Human Services dollars from the General Fund.

#### Prevention Strategy

Prevention is a cornerstone of the fight against homelessness in Cincinnati. Homelessness prevention must continue in four significant ways:

- Provide affordable housing for the city's very-low income population and where possible augment that housing with supportive services for the special needs populations of the community. This blend of housing and services will do the most for homelessness prevention. (Both the renovation of housing for very-low income and the support of service-enriched housing for special needs have received priority attention in other portions of this plan.)
- Provide support for efforts that enable persons to maximize individual and family economic self-sufficiency. These programs include job training, placement, and retention support; family supports, case management for persons with special needs, and basic community building activities. (These support efforts are also discussed and prioritized in other portions of this plan.)
- Continued emphasis on transitional and service-enriched permanent housing development within the Continuum of Care in an effort to blend housing and service opportunities for persons who are currently homeless and provide them with maximum tools to avoid homelessness in the future.
- Coordinate the Continuum of Care programs and efforts with the prevention programs funded throughout the city from other funds including programs at the area's Emergency Assistance Centers (e.g. FreeStore/Foodbank, Mercy Franciscan at St. John's, and multiple neighborhood based pantries and centers); the multiple prevention programs funded through FEMA including emergency rent/mortgage assistance and utility assistance; the HIV Prevention Programs funded through HHS support; and the programs of the Mental Health and Substance Abuse Board which support special populations.

## Objectives

The City will fund programs to meet the following objectives. The most likely funding sources to be used are shown in parentheses. The performance indicator is also shown in parentheses.

HUD Table 1C for the Homeless

	2000 Target	5 Years Targets
<ul style="list-style-type: none"> <li>Support operations and essential services of current shelters and transitional housing providers at locations convenient and accessible to the homeless population (ESG) (Organizations)</li> </ul>	10	42
<ul style="list-style-type: none"> <li>Renovate emergency shelters and transitional housing facilities (CDBG, COC or ESG) (Public Facilities)</li> </ul>	2	14
<ul style="list-style-type: none"> <li>Improve operations in the network of COC providers. Assess and modify the Quick Access System to better utilize the existing units (June 2000). Design a method for adjusting to seasonal shifts in homelessness by creating capacity for seasonal emergency beds (January 2001). Establish a uniform set of data and methods for collecting homeless data (July 2001). (CDBG or ESG). There are no performance indicators for this planning objective.</li> </ul>	NA	NA
<ul style="list-style-type: none"> <li>Provide Shelter Plus Care or other permanent housing for homeless persons with disabilities (COC) (Persons Who Are Homeless).</li> </ul>	283	400
<ul style="list-style-type: none"> <li>Renew eligible, evaluated Supportive Housing Program (SHP) services-only or services-included assistance (COC) (Organization)</li> </ul>	12	40
<ul style="list-style-type: none"> <li>Create Supportive Housing Program at Franciscan Home Development (COC) (Persons Who Are Homeless)</li> </ul>	30	30
<ul style="list-style-type: none"> <li>Develop new or rehabbed service-enriched housing units (CDBG, COC, HOME) (Housing units)</li> </ul>	-	50
<ul style="list-style-type: none"> <li>Develop new or rehabbed scattered-site transitional housing units (CDBG, COC, HOME) (Housing units)</li> </ul>	-	20
<ul style="list-style-type: none"> <li>Create one new Continuum of Care services-only program annually (COC) (Organizations)</li> </ul>	1	5

Community  
Planning Input

In the community planning session on homelessness, which occurred as part of the development of the plan, the participants reached consensus on the vision, needs, priority needs and objectives for serving the population of persons who are homeless. They also made the following additional points that are not reflected in the above discussion and which have not been adopted as part of the plan *per se*:

*The group discouraged the use of Consolidated Plan funds to demolish existing structurally sound housing.*

*The group supports the City's attempts to develop linkages between non-profit developers and the private sector for investments in permanent and non-profit operated transitional housing for the homeless.*

*The group encourages better methods for providers to share information and resources across fields (e.g. rental housing, special populations, homeless, etc.), and specifically endorsed locally available software known as SOPHIA for doing this.*

*The group felt the City should promote rental housing for very-low income persons as a solution to homelessness.*

Citizen Reaction to  
Preliminary Plan

The preliminary version of the Consolidated Plan recommended that existing shelter facilities be supported "at their current locations." While this represented the consensus view of the providers involved in the planning process, some City staff and some other organizations had reservations. Therefore, the language was changed to supporting existing shelters "at locations convenient and accessible to the homeless population." Most of the comments made about the portion of the plan that concerns the homeless were related to this issue. Throughout Part 3 of the plan, quoted material has been edited to eliminate page number references to the preliminary version of the plan.

First Step Home made the following comment:

*I appreciate the seemingly total inclusion of the recommendations of the Cincinnati/ Hamilton County Continuum of Care Process in regards to housing/service needs outlined on Part Three. It is written in the Objectives and then Action Plan sections that the City will support programs that, "Support operations and essential services of current shelters and transitional housing providers at their current locations" which encourages me that the city must do just that in the case of the Drop Inn Center (then listed as one of the participating organizations).*

*Finally, I want to stress that the public comments included on [various pages] are extremely insightful, often valid and worthy of further exploration. I encourage the City of Cincinnati to include the comments in the plan or, at minimum, explore them at a later date.*

Downtown Cincinnati responded to the Preliminary Plan as follows:



*With regard to housing in downtown, my main concern with the language and intent of this document is the disregard of existing planning processes that are currently underway. The Over the Rhine Coalition, with funding from the City as well as private donations, is undertaking a comprehensive plan for the housing and business in that neighborhood. Their goals are to achieve a balance of populations, stimulate economic development, plan for homeownership and look closely at how the Washington Park Plan fits into the neighborhood. This is a major planning effort that should be allowed to work and address the needs of homelessness, SRO's and special populations within that plan in that neighborhood. In no way should the Consolidated Plan begin to suggest that establishments like the Drop In Center must remain in its existing location to be of service to its population. These types of locational issues need to be considered by the experts in the planning the city has hired. The decision on location of SRO buildings, particularly the Drop In Center, must not be made unilaterally.*

City staff alerted the Greater Cincinnati Coalition for the Homeless and the Drop Inn Center concerning the intention to change the "current location" language. Those two agencies replied as follows:

Donald Whitehead, Director, Greater Cincinnati Coalition for the Homeless wrote: *In our Consolidated Plan's public forum the issue was discussed and nearly unanimously everyone agreed that shelters should determine their own locations. According to shelters and homeless people themselves, resources must be located where they are accessible. Also, the community did not want scarce resources spent moving shelters from one place to another.*

Pat Clifford, General Coordinator, Drop Inn Center wrote: *The best location for the Drop Inn Center is right where it is. We are strategically located near other resources that homeless people need in order to gain independence. We also do not want to waste the many hours of labor and millions of dollars the public has already put into renovating our present location.*

City Response to the Location Issue: The City agrees that resources for the homeless must be located in places accessible and convenient to the population to be served, and hence the inclusion of those ideas in the revised language. The City further agrees that many shelters are currently accessible and located conveniently. The City is not, however, prepared to say that every shelter must be maintained at its current location.

On a different topic, a resident of Downtown wrote to recommend that bars and convenience stores be kept some distance from Single Room Occupancy (SRO) units. The writer argued that many persons in SRO units have had substance abuse problems. This citizen also wanted to restrict SRO occupancy to persons with jobs, or at least to exclude persons who deal drugs or engage in prostitution. City Response: Zoning in the Downtown will dictate what uses are permitted. Limiting housing to persons with jobs would exclude persons living on pensions or Social Security, and would probably be illegal. Criminal activity by tenants is cause for conviction.

## Special Populations

**Vision** The City will collaborate with a wide variety of public and private organizations in planning and providing housing and service resources to persons with special needs in order that they may live independently.

**Needs** HUD recognizes the following special populations. The City of Cincinnati has chosen not to identify priority needs among this set of persons with special needs.

**The Frail Elderly:** In 1990, there were 50,726 persons in Cincinnati (23.9 percent) age 65 or older. Nine percent of these older persons were living in group quarters and 9 percent were living in institutions, the latter group being nearly entirely in nursing homes. Eighteen percent of persons 65-74 and 31 percent of persons 75 and older reported either a mobility limitation or a self-care limitation, or both. There were 37,387 households with a member 65 or over. Nearly half were owners, meaning that elderly residents of Cincinnati are more likely to be homeowners than younger people.

The frail elderly require counseling services to help them make decisions about whether to live independently and how to arrange their finances to help them do so. There has been an increase in predatory lending that makes this service more important than before. Home repairs and assistance in making their units accessible can help the frail elderly maintain their independent living status.

**Persons With Physical Impairments:** Most of Cincinnati's housing stock is unsuited for persons with physical disabilities. Independent Living Options (ILO) estimates a need for a total of 29,000 accessible units. Based on the 1990 Census, there are 42,711 households in which at least one member has a physical disability. Of these, 36.8 percent are very low-income households and an additional 18.0 percent have low incomes. The Cincinnati Metropolitan Housing Authority (CMHA) has a limited supply of handicapped accessible units, used for both elderly and non-elderly households.

Persons with impairments require help making their homes and apartments more accessible. They would also benefit from accessibility improvements in public and non-profit service facilities.

**Persons with Mental Retardation And Developmental Disabilities:** The Hamilton County Board of Mental Retardation and Developmental Disabilities (HCBMR/DD) has provided residential services since the late 1970's. Today there are approximately 1,000 individuals with disabilities receiving residential services and supports. There is currently a waiting list for residential services of 500 individuals. Approximately 300 individuals are requesting an alternative residential option.

**Persons with Mental Illness:** Excel is an organization that works under contract with the Hamilton County Board of Mental Health Services to provide housing for persons

with serious mental illness. Excel coordinates a comprehensive network of services that ranges from group homes to independent living options. Their system of housing resources currently serves approximately 950 persons with serious mental illness. There is a waiting list of approximately 200 persons.

**Persons with HIV/AIDS:** The City is the grantee for a 12 county Eligible Metropolitan Statistical Area (EMSA) that covers parts of three states. The number of deaths due to AIDS has fallen dramatically since 1995. It is estimated that there are 2,100 to 2,800 people with HIV/AIDS in the region. While once a predominantly gay, white male disease, new cases of HIV infection have been more likely to occur among African Americans than among whites. Now, many persons with HIV/AIDS are likely to have substance abuse problems. More persons with HIV/AIDS are suffering from serious mental illness than was the case several years ago. Three local agencies play major roles in the provision of case management and housing services to persons with HIV/AIDS: AIDS Volunteers of Cincinnati (AVOC), Caracole, Inc. and the Northern Kentucky Independent District Health Department.

A recently conducted evaluation found a need to maintain the existing case management services and the existing use of HOPWA funds to keep people in their homes. The study found that HIV/AIDS service providers should do more outreach to the African American community and coordinate more effectively with the substance abuse treatment providers. Two of the HIV/AIDS service providers are housed in facilities that are in need of significant upgrades. The organizations that are part of the case management system need a better computer system for managing client information. Finally, there is a need for better housing resources for men in Northern Kentucky. Planning support should be directed at this problem with the idea that programming will be supported in subsequent years if the planning effort is successful.

Support for the existing transitional housing program should be continued and efforts should be made to maintain the number of Shelter Plus Care subsidies. However, the latter has been incorporated into the plan for persons who are homeless.

**Persons with Substance Abuse Problems:** The Hamilton County Alcohol and Drug Addiction Services (ADAS) board is the major funding agency for persons with substance abuse problems. The ADAS board funds agencies with a combined capacity of 445 beds. While these beds do not meet the HUD definition of transitional housing for the homeless, they do represent transitional housing for people who require additional support after crisis treatment and preparing for independent, sober living.

#### Strategy

The City's strategy for providing housing and services to the above groups varies widely from one to the other. The City is the HUD grantee for HOPWA funds. That means that the City of Cincinnati has a special responsibility to plan for the needs of the population of persons with HIV/AIDS and to oversee the allocation process. It does this through a representative regional body known as the HOPWA Advisory

Committee. In contrast, it is the county that is responsible for programs in the areas of mental illness, mental retardation and substance abuse.

Many of the needs of these special populations touch on issues of homelessness. All services for persons in these special populations that involve emergency shelters, transitional housing or permanent housing have already been addressed in the section on homelessness.

- With respect to HIV/AIDS, the City will maintain the existing housing and service programs through the existing network of AIDS services providers and assist them in their continuing efforts to respond to the changing demographics of HIV/AIDS.
- With respect to the frail elderly, the City will continue to support direct federal applications for elderly housing, support housing counseling programs that can assist elderly persons in maintaining independent living and protect them from predatory lenders. In addition, the City will continue to fund home repair services and accessibility improvements that can help the elderly live independently.
- With respect to persons with disabilities, the City will fund home repair services and accessibility improvements to allow such persons to live independently in units. The City currently provides this service for homeowners, and will consider providing the service to persons in rental units as well, with landlord approval.
- With respect to all special populations, the City of Cincinnati will look for opportunities to have a significant impact on the ability of service providers to provide programming. Each year the City will assist a small number of agencies with support for renovation to public facilities that results in structural enhancements or modifications. Agencies to be assisted can include those dedicated to serving special populations and those that serve a wider range of persons but whose facilities are not accessible.
- The City will consider using some of its housing dollars in partnership with not-for-profit agencies serving special populations to create additional service-enriched housing units for non-homeless persons.
- The City of Cincinnati will look for opportunities to coordinate its funding allocations with Hamilton County in those areas where the county is the grantee for state or federal dollars dedicated to serving persons with mental retardation, development disabilities, serious mental illness or substance abuse problems.

- The City would benefit from additional housing units for persons in any of these special populations and will, therefore, support applications for funding from HUD's supportive housing programs for the elderly (Section 202) or persons with disabilities (Section 811).

## Objectives

The City will support programs to help it meet the following objectives:

HUD Table 1C for Special Populations

	2000 Target	5 Years Targets
<ul style="list-style-type: none"> <li>▪ Provide operational support for 20 beds of congregate, transitional housing for persons with HIV/AIDS (HOPWA) (Persons with Special Needs)</li> </ul>	20	100
<ul style="list-style-type: none"> <li>▪ Provide direct services for persons with HIV/AIDS, including housing assistance, supportive services and linkages to medical support (HOPWA) (Persons with Special Needs)</li> </ul>	420	2,100
<ul style="list-style-type: none"> <li>▪ Provide short-term, rent, mortgage or utility assistance to persons with HIV/AIDS (HOPWA) (Persons with Special Needs)</li> </ul>	350	1,500
<ul style="list-style-type: none"> <li>▪ Create an improved housing information system for use in housing and case management for persons with HIV/AIDS (Organizations)</li> </ul>	8	8
<ul style="list-style-type: none"> <li>▪ Assist two organizations provide improved housing information services for persons with HIV/AIDS to the African-American community and substance abuse providers (Organizations)</li> </ul>	2	2
<ul style="list-style-type: none"> <li>▪ Upgrade the facilities of two service providers who serve persons with HIV/AIDS (Public Facilities)</li> </ul>	2	2
<ul style="list-style-type: none"> <li>▪ Provide planning support to organizations in Northern Kentucky in developing housing solutions for single men with HIV/AIDS (Organizations)</li> </ul>	1	1
<ul style="list-style-type: none"> <li>▪ Provide housing counseling services to frail elderly persons (Elderly)</li> </ul>	40	200
<ul style="list-style-type: none"> <li>▪ Provide home repair services to frail elderly persons (Elderly Households)</li> </ul>	80	400

- |  |    |     |
|--|----|-----|
| ▪ Provide home repair and accessibility upgrade services to persons with disabilities (Persons with Special Needs) | 40 | 200 |
| ▪ Help one service organization a year make significant upgrades to its facilities (Public Facilities)             | 1  | 1   |

Community  
Planning Input

The following comments were made at the community planning sessions concerning the general needs of these special populations, which occurred as part of the development of the preliminary plan. While some of these comments were incorporated into the plan, the inclusion of a comment in this list does not mean that the recommendation or comment has been adopted by the City of Cincinnati as part of the plan.

*Managed care creates problems because people with special needs are being excluded from treatment. Providers are cutting cost. University Hospital has a more restrictive policy on prescription drugs than used to be the case; people are put into collections immediately. Jail staff members are reluctant to medicate inmates since the jail also has a privatized mental health service. Some providers are finding that people referred from hospitals need other emergency services in addition to detox.*

*Dual and triple diagnosis individuals represent challenges for the treatment community.*

*For the HIV/AIDS population, the most immediately pressing problem is not HIV/AIDS but substance abuse, and in many cases mental health. Two-thirds or more of clients have substance abuse problem and nearly that many have mental health problems. Part of the problem is that the non-AIDS agencies refer all clients to AVOC and Caracole because of their assumption that HIV/AIDS is the pressing problem. Other service providers must be educated about the needs of the HIV/AIDS population for comprehensive services.*

*In alcohol treatment, the funding trend is treatment for youth. This takes funds away from the baseline services that are needed for other persons.*

*There is a shortage of money to serve the Substance Abuse-Mentally Ill (SAMI) population as a result of state action.*

*The success rate for SAMI clients is low; they are very difficult to serve.*

*Some clients of the Department of Human Services will be worse off because of welfare reform. The Hamilton County Department of Human Services will not be providing exemptions for welfare recipients that would enable them to stay on the rolls beyond the three-year limit set by the Ohio legislature.*

*For persons with physical disabilities, housing that has services attached is difficult to find. Further, in order to file for Medicare/Medicaid funding for personal assistance services, the client must have a housing address, and not all of them do. There is an extreme lack of housing for the physically disabled.*

*There is a small but critical need for interpreters so that the deaf can receive substance abuse treatment.*

*There is discrimination that prevents persons with disabilities from getting housing – both new construction and old construction.*

*Shelters and agencies serving the homeless must be made ADA compliant.*

*Mental health services provided by the Mental Health Board are difficult to access unless you are profoundly mentally ill or a youth. AIDS-related dementia is not considered a mental health issue.*

Planning session participants made recommendations for strategies and objectives. While some of these comments were incorporated into the plan, the inclusion of a comment in this list does not mean that the recommendation or comment has been adopted by the City of Cincinnati as part of the plan.

*There should be better integration of funding processes. The funding system should be similar to the Continuum of Care system. All agencies need to be together in the planning process.*

*The City should issue requests for proposals (RFP) in response to specific objectives.*

*There should be a formula that allocates some funds for ongoing services and some funds for new initiatives. The United Way, for example, places too much emphasis on RFPs and does not provide enough support for agencies with on-going missions.*

*RFPs should encourage or require collaborations between agencies.*

*There were mixed views on whether the City should provide seed funds for innovative programs.*

*The City should not commit its funds to problems for which there are other dedicated fund sources.*

*Create a fund to be available to tenants so that they can make accessibility improvements in private rental housing built before March 1991 (when rental housing was required to provide some accessible units).*

*Target some number of units of new housing or rehabilitated housing that would have service linkages for substance abuse (sober housing, service-enriched housing) or other needs of persons with special problems.*

*Maintain current support to agencies needing renovation or repairs.*

Citizen Reaction to  
Preliminary Plan

Only one response to the preliminary version of the plan was received that touched on the needs of special populations. Excel, an organization cited in Part 1 for its work with persons with serious mental illness, suggested a number of improvements in the material describing housing services for the seriously mentally ill. Those suggestions were incorporated in their entirety.

## Housing

Vision

The City of Cincinnati includes diverse neighborhoods that offer opportunities and choices to all. The City's neighborhoods are dynamic, safe places where its citizens can live, work, and play.

Needs

In 1990, there were 37,363 households in the City of Cincinnati with incomes in the range that HUD considers to be very low (less than 30 percent of the metropolitan area's median family income, adjusted for size). Most of these very low-income households are renters. A large proportion of these households pay more than 30 percent of their income for housing costs, which HUD considers to be the criterion for housing cost burden. Except for the larger families (5 or more persons), overcrowding cannot be documented as severe a problem as cost burden. There are no good data on housing quality, but the consensus of community experts who attended the community planning session was that housing quality in Cincinnati, especially in this income range, is a serious and growing problem.

Low-income households have incomes between 31 and 50 percent of the size-adjusted area median. A two-earner household in which both workers are employed full-time at minimum-wage jobs would fall into this category. In 1990, there were 21,319 low-income households in Cincinnati. The greatest problem in this category is also affordability. In addition, housing quality is a problem. For larger families, overcrowding can be a problem.

In 1990, 27,977 households in Cincinnati had what HUD considers moderate incomes, between 51 and 80 percent of the size-adjusted area median family income (or, for a family of four, an annual 1999 income of \$25,501 to \$40,800).

In addition to affordability, crowding and the quality of the housing stock, some other issues to be considered in planning for housing are as follows:

- There are approximately 18,000 units of assisted housing in Cincinnati (public housing or any kind of Section 8 subsidy). These units are nearly entirely filled by persons whose incomes fall into the very low, low or moderate range. With the Laurel Homes and Lincoln Court renovation work, there will be a net loss of several hundred public housing units in Cincinnati. In addition, a very large proportion of the City's Section 8 subsidized units are coming up for renewal.



While there is reason to worry about the proportion of these that may not be renewed, there is scant data upon which to make a prediction. There may only be a small net loss in project-based Section 8 units but the City must have a strategy in the event the loss is greater. At the time this plan was prepared, HUD knew that the owners of 253 units of project-based Section 8 were opting out of the system. Further, HUD was considering enforcement action against 12 projects with 483 units with Section 8 subsidies. Combined with the loss of 726 units of public housing, Cincinnati is facing the real possibility that 1,462 housing units that are affordable for persons with low and moderate-incomes will no longer be available, or about 8 percent of the City's total stock of assisted housing.

- Cincinnati is one of the most segregated housing markets in the country. As demonstrated in Part 1 of the report, there are a number of City neighborhoods that are nearly entirely African American in composition and the degree of racial concentration in the City is stubbornly high.
- The City includes significant concentrations of poverty. In 13 Cincinnati neighborhoods, more than one person out of every three is below the poverty line.
- Predatory lending practices are victimizing elderly and low-income homeowners. This is a recent phenomenon that is not well documented in Cincinnati, although many community experts said that it is happening here. The Woodstock Foundation in Chicago has just released what may be the first documentation of this practice, although their research is confined to the Chicago area.
- The costs associated with bringing a building into full compliance with the City's building code can sometimes interfere with the ability of homeowners to make renovations and repairs, even with financial assistance.
- Nearly every building in the City built before 1978 contains lead paint. Any public money used in rehabilitating such structures must contend with this hazard.
- The City has an unusually low rate of home ownership. While the City should not attempt to create owners in the very low-income category, it should engage in efforts to increase ownership in the low and moderate-income categories. Existing owners, however, should be assisted. Many of the poorest homeowners are elderly. With some renovation assistance, some of these can continue living independently. Others could benefit from counseling around the issue of whether or not to sell. Low ownership rates help to perpetuate poverty because people do not have access to the wealth-creating engine that a

home represents. Home ownership among African Americans is actually declining.

- Improved accessibility for persons with physical limitations and for the frail elderly is important. The last complete Section 504 Needs Assessment produced by the Cincinnati Metropolitan Housing Authority was done in June 1995. At that time, CMHA reported 242 accessible units and projected making 75 more units accessible over the next 18 months. Since that time, CMHA has completed needs assessments on a site-by-site basis and has updated many of its facilities, as described in Part 1. As of October 1999, there are nearly 500 fully or partially handicapped-accessible units in CMHA's portfolio.
- There are continuing concerns about the roles of the lending and insurance communities and the fairness of their practices with respect to minorities and low-income neighborhoods.
- Housing construction in Cincinnati is expensive. There is little available land and what is available is difficult to develop.

#### Priority Needs

The following priority needs were established in the community planning sessions on homeownership and rental housing. Estimated units come from analyses of 1990 Census data by HUD prepared for the Comprehensive Housing Affordability Strategy (see Attachment II). Estimated costs were calculated as follows.

- It was estimated that 10 percent of all housing units inhabited by very low-income households would be more cheaply replaced than rehabbed, and that this was also true of 5 percent of units occupied by low-income households. Replacement costs for rental units were estimated at \$50,000 for small related families, \$65,000 for large related families, \$50,000 for elderly households, and \$40,000 for other units. Owner replacement costs were estimated at \$75,000. This analysis does not take into account the fact that some properties in historic preservation districts could not be rebuilt.
- It was estimated that 15 percent of all units occupied by very low-income households are in need of major rehabilitation and that the same is true of 10 percent of low-income households and 5 percent of moderate-income households. The cost of a major rehabilitation was set at \$25,000.
- It was estimated that 50 percent of very low-income households require interventions in the form of job training or education to make them economically self-sufficient, and that the cost of such interventions would average \$30,000. Twenty percent of low-income households were estimated to require such interventions.

- Finally, it was assumed that 30 percent of very low-income, 20 percent of low-income and 10 percent of moderate-income households require ancillary services or interventions with an average cost of \$5,000. Such services include fair housing initiatives on their behalf, housing counseling, homeownership programs, etc.

Household types and income levels are described more fully in the Glossary in Attachment III. A household is classified as Elderly if the head of household is 62 or older, regardless of whether it is a one-person household or a family household. Small and large related households are classified as such only if there is a family relationship among two or more members (e.g., marriage, parent/child, adoption). Other households include non-elderly one-person households (the majority of other households) as well as non-family households.

HUD Table 2A Priority  
Housing Needs

Household Type		Income as % of MSA Median	Priority Need Level	Estimated Units	Estimated Dollars to Address
Renter	Small Related (2 – 4 Persons)	0-30%	H	11,083	\$279,845,750
		31-50%	M	4,436	\$53,232,000
		51-80%	H	5,970	\$10,447,500
	Large Related (5 or More Persons)	0-30%	H	2,788	\$74,579,000
		31-50%	H	1,078	\$13,744,500
		51-80%	H	1,240	\$2,170,000
	Elderly (Head is 62 or Older)	0-30%	H	8,442	\$86,530,500
		31-50%	M	4,083	\$24,498,000
		51-80%	L	2,742	\$4,798,500
	All Other (Including 1 Person)	0-30%	M	10,018	\$242,936,500
		31-50%	M	5,909	\$67,953,500
		51-80%	L	8,158	\$14,276,500
Owner	0-30%	H	5,032	\$94,350,000	
	31-50%	H	5,813	\$77,022,250	
	51-80%	H	9,867	\$17,267,250	

#### Strategy

The City's housing strategy has four components:

- Improved opportunities for homeownership
- Assistance to existing homeowners
- Improved opportunities for affordable rental housing
- Fair housing and increased choice in housing

In implementing these strategies, the City will take account of the general strategies laid out in Part 2 of the Plan: promote regionalism, create partnerships, leverage City dollars, pay attention to the need for neighborhood revitalization, target resources geographically, and monitor the results.

#### General Strategic Considerations

The City of Cincinnati does not generally endorse the use of rental assistance using CDBG or HOME funds. There is short-term rental assistance for households who are forced to relocate. Through a Community Based Development Organization, the City also operates a small rental assistance program at the Central Parkway Towers. One out of every six rental units in the City receives some form of rental assistance through CMHA or Section 8. Because the city has a large supply of rental housing stock, much of it in need of rehabilitation, the City focuses on a rehabilitation strategy to ensure that there is an adequate supply of affordable rental units in standard condition for its low income renter residents.

Because the City is built out, there are limited opportunities for new construction of affordable units. With high concentrations of poverty in so many of its neighborhoods, it is City policy to focus more on promoting housing choice and creating economic development opportunities than on the creation of new assisted units, especially more assisted units in poverty neighborhoods. Note, however, that the City is committed to preserving viable project-based Section 8 units, and the Plan lays out a strategy later in this section for working with other organizations to ensure that this happens.

Because the number of abandoned housing units is relatively small and there are limited areas suited to wholesale redevelopment, the City has a limited strategy for acquisition of existing units. A Homesteading Program for new homeowners is one method for recycling blighted housing units.

The City's strategy for new and existing homeownership housing emphasizes the rehabilitation of old units because the City's housing stock is aging. It also includes limited new construction and acquisition of units for redevelopment. The City's strategy also emphasizes preparing households for ownership opportunities. Increasing the City's low ownership rate can only be done by increasing the supply of units appropriate for ownership *and* by ensuring that there are households who are ready to own.

#### Improved Opportunities for Home Ownership

The City should promote home ownership for new residents and persons who are now renting in the City in the following ways.

- Encourage new construction in the City.
- Support fair housing initiatives and promote increased lending to minority applicants and in low-income neighborhoods.

- Provide counseling and education services for first time buyers.
- Support neighborhood revitalization efforts.
- Provide tax abatements, down payment assistance, and other incentives that change the cost equation for purchasing a home.
- Support efforts to encourage the use of Individual Development Accounts (which can provide for accumulation of down-payment funds).
- Encourage home ownership training and support for public housing residents.
- Preserve the stock of duplexes and single unit structures for potential homeowners by making such structures ineligible for programs aimed at assisting renters.

#### Assistance to Existing Homeowners

The City should assist existing homeowners to maintain their homes, where appropriate.

- The City will provide counseling and education services.
- The City will provide owners with access to low-cost loans or grants to effect repairs and renovations.
- The City will assist homeowners with homeownership maintenance training.
- The City will apply for funds to do lead abatement more widely. In addition, the City will comply with federal lead regulations whenever it undertakes rehabilitation projects.

Note that under the category of Special Populations, special strategies for the frail elderly and persons with physical disabilities were included.

#### Improved Opportunities for Affordable Rental Housing and Support of Public Housing

The City's strategies for low and moderate income rental housing are as follows:

- Assist low and moderate-income renters find affordable units by increasing the number of safe, sanitary units on the market. This strategy commits the City to increasing the supply of affordable rental units.
- Provide support services that assist low and moderate-income renters in finding or maintaining affordable housing. This strategy commits the City to doing a better job of linking low and moderate-income households to housing resources, and keeping them in units.

- The City will apply for funds to conduct research on the problem of lead hazards and to do lead abatement more widely. In addition, the City will comply with federal lead regulations whenever it undertakes rehabilitation projects. The City will continue to offer relocation services for households who must move because of lead paint hazards.
- Support CMHA HOPE VI projects (i.e., provide funding, review development plans, grant permits, inspect construction work, and monitor relocation). These projects should produce high quality public housing while also creating more economically diverse neighborhoods. The City will be monitoring its investments in these projects and the impact of the projects on residents.
- The City will support new Section 8 vouchers for the community and coordinate with CMHA and the Hamilton County Department of Community Development to improve the ability of clients to use existing subsidies.
- The City will also explore ways to keep project-based Section 8 subsidies. The City will actively promote and cooperate in a collaborative venture with interested organizations to monitor the status of project-based Section 8 in Hamilton County. One goal will be to identify projects at risk of foreclosure or projects where the owner might opt out of the Section 8 program. A second goal will be to formulate a response to the threatened loss of subsidized units. Potential collaborators include CMHA, Cincinnatians for Affordable Housing, Legal Aid and Housing Opportunities Made Equal. The City must not only work to retain subsidized units, it must balance this goal with the goal of discouraging the concentration of subsidized units.
- The City will support applications by CMHA and non-profit organizations for federal grants for the upkeep and modernization of housing and for programs to improve the quality of life in public housing and in all of the City's neighborhoods.

Note that under the category of Special Populations, the special strategy presented for persons with physical disabilities applies to both owner and rental households.

#### Fair Housing and Increased Choice

Many of the components of the City's fair housing strategy have already been discussed as parts of the strategies for homeowners and renters. However, discussing them together as part of a strategy to promote fair housing and increased choice underscores the City's commitment to reducing concentrations of African Americans and poverty.

Impediments to fair housing were identified in a study jointly commissioned by the City of Cincinnati and Hamilton County that was completed in September 1996. Thirteen major impediments were identified.

**Recommendation or Impediment**

The City and County must do more than contract with HOME (Housing Opportunities Made Equal) to have and implement a fair housing program.

The City and County should develop a joint policy on fair housing to address issues before they become unmanageable.

The City and County should develop cooperative efforts with local advocacy groups to work toward a solution to the problem caused by the NIMBY syndrome.

The City and County need to take a strong role in combating housing discrimination. The City and County can show strong political and community will to overcome discrimination.

The City should review its Housing and Zoning Code in an effort to make it more user friendly and to ensure that it helps housing development.

The County should examine its zoning regulations.

Support for HOME to continue its activities in enforcement, advocacy, education and community relations should be continued and, if possible, increased.

More Section 8 Certificates and Vouchers are needed in both the City and County. Along with this, there is a need for more available units in the County and in moderate and middle-income areas of the City.

The lending review of HMDA (Home Mortgage Disclosure Act) data should continue on an ongoing basis.

Efforts should be made to encourage local lenders to promote their home ownership programs as well as they promote their refinancing and home equity credit lines. While the City and County cannot develop marketing plans for lenders, they can influence lenders with regard to CRA requirements by suggesting responses to community needs.

The City and County should approach lenders and offer to become partners in their CRA activities

**Emerging Response/Strategy**

A Fair Housing Committee, described in Part 2, is at work on developing a policy. Many members of that committee were involved in the process of developing the Consolidated Plan

The County declined to formally participate in the Fair Housing Committee, although some staff members of county departments do attend some meetings.

Exactly such a collaborative effort is proposed below, initially aimed at responding to the threatened loss of subsidized housing units. A more complete response will have to await the recommendations of the Fair Housing Committee.

HOME plays a critical role in helping the City combat housing discrimination. They process administrative complaints with HUD, file lawsuits, and negotiate settlements. The City itself needs to do more to examine the impact of all of its housing programs on the concentration of African Americans and low-income households, as will be proposed below.

City Council adopted amendments to the City's Housing Code in 1998. The amendments reduce several building requirements so that the City's code is not more restrictive than the Ohio (State) Building Code. The City Planning Department is looking to revise the Zoning Code.

No action by the City.

HOME is proposed for funding in Part 4 of this plan. It would be unwise to promise any organization increased funding prior to an evaluation each year. Nevertheless, as an indicator of the City's support for HOME, a recommended strategy described below does propose a new partnership between the City and HOME (and other organizations).

Proposals made below address this point. This recommendation is even more salient today than when it was made in 1996 because of the potential loss of Section 8 units and the actual loss of 726 public housing units.

HMDA data is now available in electronic format, making it easy for any interested party to analyze lending data. HOME now receives an analysis from COHIO, a statewide monitoring group). In addition, the Coalition of Neighborhoods has completed situational analyses of local lending institutions.

In 1996-97, the City cosponsored a regional Residential Mortgage Credit project to address root causes of low lending rates to minority and low-income buyers. The City has established the Cincinnati Homeownership Partnership to address the problem. For example, the City is funding a one stop Homeownership Center, designed to make a full range of financial products and services available to low income and minority residents of the City who wish to become homeowners. The Department of Neighborhood Services meets periodically with area banks to exchange information on new lending programs and the City's priorities for private sector participation in specific projects.

The City has instituted a first time homebuyers program with Bank One. The Better Housing League and Neighborhood Housing Services provide counseling for first time buyers. The City has a program to provide forgivable down payment assistance grants. Many lenders have formally committed to participate in housing lending in the Empowerment Zone. Banks support the City's homesteading program.

The Fair Housing Amendments Act of 1988 should be enforced. This Act requires that all multi-family housing of four or more units be accessible.

Projects receiving federal funds must meet federal requirements for unit accessibility. Through the local Continuum of Care planning process, the City addresses some accessibility needs. The Department of Neighborhood Services provides retrofitting services to low income disabled households through its Housing Maintenance program. These activities will not only continue, they are being associated with specific objectives (already presented above in the section on Special Populations) for the frail elderly and persons with disabilities.

A study should be undertaken regarding the effects of public transportation on making suburban employment accessible to low and moderate-income residents of the City.

Access to jobs in suburban areas would give low-income residents of the City greater economic power and access to housing opportunities of the types and in the locations of their choice. The Empowerment Zone Corporation is looking at accessibility. The City offers some services in this respect (see the section on Community Needs at the end of this part of the plan).

The City is actively supporting the Cincinnati Metropolitan Housing Authority's (CMHA) HOPE VI developments. These projects play an important role in the City's fair housing strategy because they will create a more economically diverse household base in one of Cincinnati's most poverty-stricken neighborhoods. HOPE VI also improves opportunities for choice by current residents of public housing.

The City will support new Section 8 vouchers or certificates for the community and will coordinate with CMHA, the Hamilton County Department of Community Development, and HOME to improve the ability of clients to use vouchers throughout the region. The City will support programs to encourage landlords in areas of low concentration to participate in the Section 8 program.

In developing strategies for the preservation of project-based Section 8 the City will work to balance the goal of retaining a subsidized structure with the goal of discouraging the concentration of subsidies in a few impacted neighborhoods.

In implementing its entire plan, the City will work to increase the economic diversity of its neighborhoods and counter the forces acting to concentrate poverty and racial minorities.

#### Plan To Minimize Displacement

In carrying out its Consolidated Plan programs, the City of Cincinnati minimizes displacement of low-income families in the following manner.

- The City's rehabilitation loan programs are structured to discourage permanent displacement. Any permanent relocation, or the temporary relocation of tenants that may be necessary during the rehabilitation process, is a cost to the property owner. This increases the owner's incentive to avoid displacement and minimize any relocation during the rehabilitation process.
- The Code Related Relocation Program provides relocation benefits to tenants who are forced to vacate their homes due to the enforcement of the City's local building or health codes. In addition, the program now provides relocation benefits for families with children with elevated blood lead levels. Benefits include moving expenses and rent payments, as well as assistance in locating safe and sanitary housing.



- The City offers relocation assistance to residents and businesses displaced as a result of locally funded development activity.

## Objectives

Following is a list of the housing objectives that the City should adopt (performance indicators are shown in parentheses).

## HUD Table 2C Housing Objectives

	2000 Target	5 Years Targets
▪ Develop new and rehabilitated housing units suitable for home ownership by persons with low and moderate incomes (Housing units)	95	670
▪ Assist low income and moderate income renters in making the transition to owner-occupancy (Households)	370	1,850
▪ Help low-income homeowners maintain ownership of their homes (Households)	770	3,850
▪ Develop rental units for very low-income and low-income households (Housing units)	190	1,735
▪ Provide supportive services for very low-income and low-income renters that will enable them to find and keep affordable units (Households)	6,200	25,850
▪ Promote fair housing (Households)	1,750	7,000
▪ Develop and support comprehensive efforts to revitalize neighborhoods while also expanding economic opportunities (Organizations)	35	140
▪ Reduce blighting influences in residential neighborhoods (Housing units)	6,450	25,650

## Production Goals by Income

Units rehabilitated or built with HOME funds will meet all HOME requirements with respect to the population served. Families receiving a Section 8 portable voucher will occupy many HOME units and their incomes cannot be predicted in advance. However, recent history provides a good basis for predicting what will happen over the next five years.

**One Year Goals**

<b>Objective</b>	<b>Median Family Income</b>			
	<b>0%-30%</b>	<b>31%-50%</b>	<b>51%-80%</b>	<b>Over 80%</b>
New Homeowner Units	0	0	90	5
New Homeownership Assistance	0	5	65	
Existing Homeowner Rehabilitation	100	400	70	
Rental Unit Development	70	70	50	
	170	475	275	5

**Five Year Goals**

<b>Objective</b>	<b>Median Family Income</b>			
	<b>0%-30%</b>	<b>31%-50%</b>	<b>51%-80%</b>	<b>Over 80%</b>
New Homeowner Units	0	0	450	25
New Homeownership Assistance	0	25	325	
Existing Homeowner Rehabilitation	500	2000	350	
Rental Unit Development	350	350	250	
	850	2375	1375	25

Community  
Planning Input

The following points were made in the community planning session on ownership, which was held as part of the development of the preliminary plan. While some of these comments were incorporated into the plan, the inclusion of a comment in this list does not mean that the recommendation or comment has been adopted by the City of Cincinnati as part of the plan.

*Lead is a huge issue in the City because of the number of housing units built before 1980. The problem is greatest in low-income neighborhoods where homes have not been maintained. Upper income homes of the same age have been maintained. There is a strong correlation of income, age of housing and lead.*

*The City must resolve the issue of using grants versus loans. The City could produce a greater flow of program income by offering low-interest loans for rehabilitation and repair services instead of giving grants. However, this is a complicated issue. The City has tried it before and ran into difficulty because there was not enough of a separation between the agency doing the work and the agency making the loan. Thus, owners who were unhappy with the quality of the work had no recourse. Nevertheless, the potential to serve more people by trying to recycle at least some of the money is great enough that the City should revisit this issue and make a decision whether or not to go back to a system of making loans rather than grants for major repairs.*

*Predatory lending has recently emerged as a big problem in the City. People who have refinanced multiple times because of huge credit card debt get into trouble. Lenders (money stores, not banks) are using unscrupulous tactics. Very low-income homeowners are losing the equity in their homes, and often losing their homes because of predatory lending and second mortgages. The City needs to fund education of existing and new homeowners concerning predatory lending.*

*There seems to be more doubling up of families; more households with three generations in owner-occupied homes.*

*On the west side there has been a significant loss in homeownership, especially in Price Hill. Real estate investors buy up single-family homes, get a bank loan as a homeowner, and then rent the houses or sell it on a land contract. There are investment clubs that teach techniques for buying up houses from owners who are behind in taxes or credit card payments.*

*Complying with historic preservation regulations gets expensive (e.g., gutters). Doing window replacements to code is also a very expensive proposition for some units in historic areas.*

*Households with very low incomes should not be candidates for home ownership. Their priority should remain high because existing owners in this income group can be helped. Exceptions to this general prohibition might include new elderly units and lease-to-own public housing units.*

*There should be a priority for programs that have funds that can be recycled. Cincinnati is different from other local jurisdictions; Cincinnati's large repairs are funded with grants while other areas make loans. Any repair over \$5,000 should be a loan.*

*There is a problem with major homeowner rehabilitation projects caused by the requirement to bring the whole unit up to code. For many who are above the existing cutoff for grant assistance (50 percent of area wide median family income), borrowing to bring their entire house up to code is too expensive. There should be a continuum of assistance available to the low-income homeowner, with or without code compliance.*

*There is need for homeowner maintenance training.*

*There is also a need for economic education and counseling of renters to bring them to home ownership readiness.*

*The City should promote employer-assisted programs. UC, for example, matches downpayment amounts for employees who buy homes near the university.*

The community planning session on public housing, held as part of the development of the preliminary plan, produced the following comments. While some of these comments were incorporated into the plan, the inclusion of a comment in this list does

not mean that the recommendation or comment has been adopted by the City of Cincinnati as part of the plan.

*There needs to be something in the plan to address the loss of public housing units and losses as a result of Section 8 opt-outs and foreclosures.*

*Several hundred units of project-based assistance have been lost and not replaced one-for-one. This represents a real loss of low-income housing capacity for the region. The City needs an approach to this problem.*

*HUD can provide data on landlords who are currently choosing to opt-out of the Section 8 program, but landlords always have the option from year-to-year to opt out.*

*A bigger concern than landlords choosing to leave the program might be foreclosures on project-based units. There are a large number of substandard units, for example, in Over-the-Rhine.*

*CMHA reported that over half of the families chose to stay in Section 8 units that CMHA acquires. These buildings being bought will be brought up to standard, and many families will stay.*

*There was discussion of a case in which a project-based building had 300 units. Rental subsidies were given to 130 existing tenants, but the vacant units did not receive subsidies. That represented a loss of 170 subsidies. Thus, the conversion of project-based to tenant-based can result in a net loss of subsidies.*

*This may be in part a function of HUD national policy. HUD is also restructuring rents. However, there are also tax credit projects, which take Section 8 subsidies and which add more units to the total. Some concern was expressed about where these tax credit are located, because they have increased the concentration of minorities and poor people in the past.*

*The City has new housing planned. The housing filtering concept means that new high-income projects free up units down the line for persons with lower incomes. However, the City should have policies about doing mixed income developments.*

*A large proportion of the homeless population does not qualify for public housing because of the one-strike policy. They are kept out because of criminal records. Section 8 has no police checks, but many landlords screen.*

*The City needs to provide housing units for persons with incomes under 30 percent of the area median who are cost-burdened (approximately 20,000 households).*

*A strategy for the preservation of affordable housing should be in the plan.*

*There was concern that new vouchers will result in the resegregation or segregation of City neighborhoods. The vouchers should be spaced out, as they are with the HOPE VI work.*

*There should be homeownership training for public housing residents, not just for the Section 8 households, through the Family Self-Sufficiency program. Also, residents of public housing need to be involved in training for employment and entrepreneurship. CMHA should expand the Family Self-Sufficiency program to public housing residents.*

*CMHA has contracted with Greater Cincinnati Mortgage Counseling Service to do resident education for homeownership for the Lincoln Court units. This is open to all CMHA residents, not just those of Lincoln Court.*

*The plan should make use of Individual Development Accounts (IDA), which banks match and which can be used for down payment*

*There was discussion of monitoring. The City will monitor the development of the HOPE VI projects. The suggestion was made that the City monitor progress and it was noted that the City already meets regularly with the project managers and the City will be monitoring the contract with CMHA.*

*If there are problems placing people with vouchers, the City should create units to make up for lost units. The City should use other City funds for low-income housing.*

*CMHA stated that they have an 80 percent success rate in placing people with vouchers in housing. Section 8 certificates do not saturate the market because CMHA recruits new landlords to participate.*

Comments made in the planning session on rental housing follow. While some of these comments were incorporated into the plan, the inclusion of a comment in this list does not mean that the recommendation or comment has been adopted by the City of Cincinnati as part of the preliminary plan.

*Vacancy rates are going up in project-based Section 8. When people get jobs, they move out just before recertification, sometimes moving to tax credit projects.*

*Many of the City's affordable rental housing units are substandard, not even considering the problem of lead hazards. One-third of callers to Legal Aid for help with tenant assistance have serious condition problems. Substandard housing is more important than overcrowding.*

*HUD is looking at substandard project-based Section 8 properties and ordering landlords to fix them or get out of the program.*

*Properties with a public subsidy should be mixed income developments. Look at the new developments downtown; there are public monies invested, but no low-income units. Examples were cited where some mixed-income housing was successfully developed.*

*There should not be any additional low income housing in Over-the-Rhine – further investment there should be market-rate housing.*

*Gap financing should carry restrictions that restrict to projects that will benefit low-income households. One City department (Neighborhood Services) requires this but another (Economic Development) does not.*

*Lead from streets and from soil is everywhere and gets into buildings. Assume any old structure has lead paint.*

*It was proposed that one-for-one replacement should be the rule for Section 8 projects. Others thought that was important but that the City could not do it all. It requires collaboration with others. Others thought that preserving project-based buildings contributes to concentrations of poverty.*

*Deconcentration through vouchering-out will not work if there are no places to use the vouchers.*

*It was suggested the City develop project-based Section 8 preservation policies. Sometimes conversion to tenant-based vouchers makes sense. The City should not try to preserve all units at all locations. A local coalition with the City as a partner should look at the range of alternatives, from loans, grants to brokering. Such a group could monitor projects potentially opting out, defaulting, or going into foreclosure. Collaborators could be CMHA, HUD, for-profit developers, non-profits, Hamilton County, State of Ohio, the corporate community, the Greater Cincinnati Housing Alliance, and the City. The City could make this happen.*

*The Housing Round (a program described in Part 4 of the Plan) is a passive process; proposals get brought in. The City needs to be more pro-active. Another person suggested, however, that the Housing Round prevents the NIMBY syndrome. Still another thought the Housing Round is too political.*

*The federal government is handing off its problems to the local level of government.*

#### Citizen Reaction to Preliminary Plan

Several suggestions were received from the staff of the Hamilton County Department of Community Development. The suggestions were aimed at clarifying and updating certain information presented in Part 1 of the Plan. Because the suggestions were adopted in their entirety, they will not be described here.

Similarly, suggested clarifications and updates for Parts 1 and 3 of the plan were received from the Cincinnati Metropolitan Housing Authority and adopted in the final version of the plan. CMHA staff did make one argument that was not incorporated into the plan: "Section 8 does not raise rent in high-cost census tracts." The City's response to this point is that it may be true, but that there is a limited basis for evaluation since Section 8 subsidies are so concentrated in low-income tracts. The impact of subsidies in low-income tracts is controversial, as noted in Part 1.

The Community Development Advisory Board (CDAB) made one suggestion for clarification, which was adopted, and the following points:

*The impact of Section Eight subsidies on private sector and public housing rents. HUD's Section Eight rent levels were thought to be high for the Cincinnati market, influencing increases in rates for market rate housing for low-income residents who are not eligible for subsidized housing, and wasting valuable HUD resources by paying more than was necessary for subsidized units.*

*Fear that adequate resources would not be in place to assure the availability of low-income units with the diminution of unit-based subsidies.*

*Difficulty with determining the validity of the Year 2000 – 2004 goals due to a lack of information about the projected goals and actual results of the Year 1995 – 1999 Consolidated Plan.*

City Response: As noted in Part I of the plan, some observers of the Cincinnati housing market do agree with the point that HUD subsidies have a perverse effect on market rate housing. However, without disputing the point, the lack of good analysis makes it difficult to concur either. The concern of the CDAB about the possible loss of project-based subsidies underscores the importance of establishing the proposed collaboration with City partners to monitor and intervene in cases where project-based units may be lost. This will be a new initiative for the City. The City recognizes that better and more timely monitoring information needs to be used in the annual allocation process, hence the recommendations at the end of this part of the plan (see section entitled, "Monitoring"). As a point of information, Year 2000 – 2004 goals are based largely on actual performance in the period 1995 – 1999.

The Legal Aid Society, Housing Opportunities Made Equal (HOME) and the Coalition of Neighborhoods offered extensive comments on the Preliminary Plan, which are largely reproduced in the following material. Minor changes in formatting were made, page number references were deleted, and some material was condensed. Because the different organizations sometimes addressed the same issues, all comments related to a given topic are presented at once, followed by the City's response.

***Improved Opportunities for Home Ownership (Legal Aid)***

*The section addressing opportunities for home ownership by those currently renting or moving to the City is encouraging. However, two additional strategies should be incorporated.*

*First, the strategy of new construction should be targeted to low or modestly priced homes, rather than high-end construction. Such a strategy may require the use of incentives (e.g., permit fee waivers, land donations, outright cash, abatements, etc.) to ensure builders the larger profit margin they could realize on more expensive homes.*

*Second, safeguards must be included in promoting increased lending to minorities and residents of low-income neighborhoods. The City acknowledges, the recent and rapid emergence of investors and sub-prime lenders who target minorities, elderly, and other vulnerable homeowners. In the past year, numerous properties in questionable condition have been sold to unsophisticated, low-income persons through very "creative" (shaky) financing arrangements. Often the seller is an individual investor who assists with financing which is not understood by the buyer. Also, while sub-prime loans often are refinancings or consolidation loans on existing mortgages, they can involve home purchases. The City should not promote abusive or risky lenders or lending programs that help only in the short term and eventually leave the borrower deep in debt and without the home.*

***Comments from HOME***

*The Plan makes a strong case for the need for the City to increase the rate of homeownership. This laudable and very beneficial goal seems to have been forgotten when the housing objectives list was presented. It appears that these objectives call for more than twice as many newly developed rental-housing units in the year 2000 as homeownership units. The five-year targets suggest almost three times as many rental units! This discrepancy between goals and production objectives should be reconciled.*

City Response: The City rarely uses CDBG funds for new housing. Housing construction is ineligible except for situations where a revitalization project is undertaken by a community-based development organization. As an example, the City has done new housing in Avondale in order to promote a socio-economic mix in an otherwise very low-income neighborhood. HOME funds, which *can* be used for new construction, are limited to low-income beneficiaries. The City does reserve a large portion of local capital funds, which are *not* the subject of this plan, to encourage new middle- and upper-income homeownership housing in order to reduce the degree of impaction, achieve a broader socio-economic mix, and promote homeownership in the City.

The City will continue to provide support to agencies providing housing counseling to homebuyers and homeowners (e.g., Better Housing League, Housing Opportunities Made Equal, Greater Cincinnati Mortgage Counseling Services). The City's Office of Consumer Protection will disseminate information and refer clients for counseling about predatory lending practices, as will the Homeownership Center. Staff from the Department of Neighborhood Services will work with the above-mentioned entities and the banks to further research the issue and determine how the City can best address and respond to this problem.

With respect to the discrepancy between objectives and production goals, the disproportionately high number of rental units compared to homeowner units to be produced over the next five years is due to the inclusion in the rental unit targets of 835 units in the HOPE VI projects. The City's financial participation in these projects is small compared to the total costs and one could argue that the City should not take



credit for all of the units constructed. When these units are excluded the five-year rental unit count is 900 units compared to 670 homeownership units. This is a much more balanced number, especially given that production of homeowner units is more expensive than rental unit production.

***Assistance to Existing Home Owners (Legal Aid)***

*Three additional strategies should be adopted by the City to aid homeowners. First, far more must be done by the City to assist low-income homeowners who need short-term cash assistance to cure a mortgage delinquency so as to save their home. Too many homes are lost by homeowners who experience a temporary loss of income through no fault of their own (e.g., layoff, divorce, injury, etc.) and who could resume payments later. Since Congress terminated the HUD assignment program in 1996, the need for this relief is even more critical. The City has declined funding for BHL's Emergency Mortgage Assistance program in the current funding cycle unless other money becomes available. Emergency mortgage assistance for deserving homeowners is critical. The City's lack of any such strategy is a glaring omission.*

*Second, the City should take a leadership position with other homeowner advocates to develop and operate a mortgage assistance program to replace HUD's former assignment program. This could be on a citywide basis or, in collaboration with others, on a statewide basis. The HEMAP (Homeowner Emergency Mortgage Assistance Program) operating in Pennsylvania is an excellent model. If the City's strategies focus only on front-end issues and do nothing on back-end issues, an opportunity to keep people in their homes is being lost.*

*Third, certain private investors and sub-prime lenders are preying on vulnerable populations. The sub-prime lending industry particularly targets existing homeowners. Many sub-prime borrowers are minority, though it is unknown to what extent "steering" is involved there. While sub-prime loans can, and do, help some people, they destroy others through a predictable foreclosure due to unnecessarily high interest rates, broker fees, and payment schedules. The City must not make the cure worse than the disease by promoting the wrong sector of the lending industry. Through passage of an ordinance, the City should impose tighter controls on abusive sub-prime lenders than currently exist under federal laws. These additional restrictions could be modeled after legislation passed this year in North Carolina, or currently being debated in New York and Minnesota, prohibiting balloon payments, prepayment penalties, hidden fees paid to brokers, and other deceptive or unconscionable practices.*

City Response: The City will evaluate the Emergency Mortgage Assistance Program and consider the need for immediate funding. In addition, the City is willing to work with other homeowner advocates to develop a plan and identify funding sources to address the problem on a long-term continuing basis. With respect to predatory lending, the City will work with its partners to disseminate information and counsel vulnerable populations.

***Lead Paint Hazards (Legal Aid Society)***

*While the plan includes a general lead strategy, we suggest that the City adopt more specific and measurable lead poisoning prevention and reduction strategies, such as:*

- *Require developers to start tracking progress in achieving lead safety, adopt cost effective measures for lead hazard control (e.g., use specialized cleaning) and perform dust tests at the end of each project.*
- *Report on whether a funded project will increase the supply of lead safe housing targeted for occupancy by families with young children.*
- *Coordinate housing program strategies with Health Department efforts to prevent and respond to lead poisoning. Neighborhoods with high EBL prevalence rates could be targeted for revitalization or other intervention. DNS could collaborate with the Health Department to obtain the addresses of EBL cases as candidates for rehab projects.*
- *Code enforcement could be targeted to effect lead hazard control in highest risk rental housing. Code enforcement for lead also should be complaint driven like any other Building or Health Department problem. Where necessary, the City could assist owners make emergency repairs, relocate tenants or support other interventions.*
- *Take steps to track and disseminate the lead safe status of housing units through mapping programs. For example, the City could create a City-wide registry of units or incorporate the addresses of units cleared by the Health Department or EPA. Without a tracking system, a community has no means to mark overall success in eradicating hazards from at-risk housing where children may live.*
- *Support the organization and implementation of lead safety education campaigns.*

City Response: Title X currently requires safe practices and, as of September 2000, will require risk assessments, work to be performed by licensed lead abatement contractors, and dust clearance testing of all units receiving federal funds in excess of \$5,000.

Over 80 percent of City housing units that are rehabilitated will have lead. As long as SRO units are not targeted, the city will be developing an increasing number of lead safe units for children.

Neighborhoods in which the City is doing rehabilitation are the neighborhoods with the oldest and least-well maintained housing stock, which correlates with the presence of lead hazards. Basing a remediation strategy on the location of rental units of EBL children is not an effective or efficient means of increasing the supply of lead-safe housing.

Buildings and Inspections does not do interior code enforcement except on a complaint basis. Further, the Buildings Department does not test for lead hazards; however, they do cite owners for peeling or deteriorated paint. The Health Department tests for lead conditions in units occupied by an Elevated Blood Lead level child. The City provides relocation services and benefits to families required to vacate units due to lead.

The Cincinnati Abatement Project (CAP) included an objective to set up a database. In addition, units to be rehabilitated under the new Title X rules with federal funds coming to the City will automatically comprise a registry of lead safe units. The City will continue its current support of lead hazard education programs and will renew attempts to involve more contractors to become lead-certified.

***Fair Housing (Legal Aid)***

*The Plan does a reasonably adequate job of identifying impediments to fair housing and discussing general responses but there are two important omissions:*

*In order to have a truly effective fair housing policy, the Plan should identify specific actions it will take to overcome the effects of impediments. In addition, the City should set a timeline for the actions to be taken and set up a system to measure progress. By doing this, the City should be able to measure how much success it has achieved a year or two from the adoption of the Plan.*

*The strategies and objectives do not mention the Regional Opportunity Counseling (ROC) Program, a highly successful partnership between CMHA and other area nonprofit organizations. The City should acknowledge the importance of continuing the ROC Program.*

***Comments from HOME***

*The Plan notes that subsidized rental housing in the City is "highly concentrated geographically" and that this housing is overwhelmingly occupied by African Americans." One cannot but agree with these statements, nor keep from noting the great amount of racial and economic segregation that has resulted. However, nowhere in the Plan is there a discussion of the policies or methods the City will set in place to discourage the concentration of subsidized housing or to provide greater choice to low-income households! Without such a discussion, the Plan is incomplete at best.*

*An obvious place to start, of course, is with the City's own funding programs. With few exceptions, the City should, as a matter of policy, refuse to fund additional low-income units which would not advance deconcentration or provide increased choice.*

*The Plan is correct that the City should seek out ways to enter into regional collaborations whenever it can. The recommendation to try to regionalize the work of the Fair Housing Committee is a sound one.*

*There are presently two programs that might provide the City the opportunity to begin such regional cooperation. HOME operates the Regional Opportunity Counseling Program and the Mobility Loan Program. Both programs aim to help Section 8 participants obtain housing in non-poverty areas of Hamilton County. County Government and CMHA are presently collaborating with and/or providing assistance to these programs. The City's participation would make them stronger and more effective and could lead to future collaborative undertakings.*

***Comments from the Coalition of Neighborhoods***

*Much has been said about City, non-profit, and institutional programs that can increase homeownership. However, what is omitted is a discussion of local, state, and national efforts to maintain, expand, and enforce the Home Mortgage Disclosure Act (HMDA), the Community Reinvestment Act (CRA), the Equal Credit Opportunity Act (ECOA), the Fair Housing Act (FH Act), and the Equal Employment Opportunity Act (EEO).*

*City Council and the Administration will have to do more to sustain and expand the staffing, research and mobilizing capacities of local fair housing and fair lending advocacy organizations. These organizations can advocate and interact with each other, lenders, insurance providers, and other housing-related institutions in many ways that the City cannot. Following are steps the City should include in its strategy:*

*Commit adequate resources to implement City Ordinance #363 and its Amendment #20. HMDA, and small business lending data for each lender, and the whole industry, should be collected, made public, analyzed, and used for purposes of compliance, and identification of investment, lending and services opportunities*

*Request that President Clinton veto the Financial Services Modernization Act. Most fair housing and fair lending experts throughout the country believe that the merger environment that will be created by this bill will result in a shrinking industry, higher loan costs, fewer houses sold or renovated, and families with less income to afford higher rent costs.*

*Establish quarterly or more frequent meetings with fair housing and fair lending groups and the City's federal and state lobbyists so that the impact of legislation and regulations can be better understood and actions coordinated. Since CRA enforcement works to increase affordable housing, the City should lobby extensively for a stronger, expanded CRA so that lenders will have an obligation to increase affordable tenant and ownership housing in a non-predatory and non-discriminatory fashion.*

*The HOPE VI projects should be examined for their impact on the Plan. For example: Stage I - result is a loss of affordable rental housing units. Stage II - some affordable rental units are put back in line and new single family units are added to the housing stock Stage III -some home owners in neighborhoods like Bond Hill, Evanston Madisonville, etc. will convert their homes; to rental units to take advantage of the large families needing to rent larger family housing. Stage IV - as many studies have suggested, them owners will then purchase housing outside of Cincinnati, and many times outside of Hamilton County. We need to ensure we don't accelerate such efforts without proper preparation.*

*The continued existence of exclusionary zoning, predatory lending, denial of rental housing and insurance based on race suggests that there are attitudes in the county that need adjustment. A discussion needs to be facilitated between citizens of Cincinnati and citizens that live outside our boundaries, in an effort to reduce racial and income mix tensions.*

*The Cincinnati Public School Board (CPS) has a serious financial interest in a successful housing strategy. It also requires CRA compliance by lenders who bid on their dollars also. A collaborative effort could prove fruitful.*

*Finally, if we don't take steps to ensure each citizen's fair ability to earn a "living wage", major components of any plan will fail simply because citizens will not make enough money to become owners. Section 8 Certificates held by worthy families are being refused, and those citizens who make too much money to qualify for Section 8 don't make enough money to afford the higher rents.*

City Response: Some of the specific action steps that the City has recently undertaken or will undertake in the near future are responsive to the above suggestions.

Additional Elements of Fair  
Housing Action Plan

- The City has recently reactivated the Community Reinvestment Committee to review community reinvestment activities of the banks with which the City has funds on deposit. The City's Fair Housing Committee will coordinate its activities to involve the CRA committee as well. The Committee will consider inviting the participation of a representative from the Cincinnati Public Schools.
- The City will undertake a predatory lending study on home ownership, home repair, and business credit that will result in recommendations for City housing programs and economic development loan programs. The recommendations should also lead to City initiatives to require lenders to make products and practices responsive to community needs.
- Efforts will be made to operate home ownership and rental development programs in a way that will provide affordable choices in nontraditional neighborhoods and higher income developments in impacted areas.

- Project-based Section 8 monitoring will be performed. Interventions will be made where it can be determined that there can be a long-term beneficial impact. In other cases, the City will strive to ensure a phased one-for-one voucher replacement of all units, not just occupied units, when a project is converted. This will result in greater choice with vouchers, provided that units are available, and use of vouchers does not erode the affordable homeownership stock through rental conversion.
- The City will evaluate and pursue opportunities for the targeted marketing of its assistance programs for use in projects in non-impacted areas of the City. The City must, however, remain responsive to the needs of projects in traditionally low-income areas. Generally, where choices can be made between assisting existing subsidized low-income projects or helping bring on-line a new tax credit project, an evaluation will be made on expected project longevity, the quality of the housing to be created, locational benefits, spinoff benefits, and the true cost to rental families served. In some cases, a new tax credit project in an impacted area may serve to offset the loss of subsidized units anticipated in the near future, the loss of non-subsidized low income units, or address the preservation of housing stock that without such assistance would be abandoned, allowed to further deteriorate, and/or be demolished eventually.
- Revisions to Part 1 of the Plan have been made to describe more fully the Regional Opportunity Counseling (ROC) Program and the Mobility Loan Program. The City will evaluate these programs and will work with HOME and CMHA to determine how the City could best support the continuation or expansion of these or alternative programs in order to achieve the goal of locating low income families in non-low income areas of the City and the county.
- The City will collaborate with the Apartment Owners Association on landlord training in fair housing issues and in support of mediation programs to be run jointly with HOME.
- Further in the future, the City will lobby for and take advantage of any change in HUD's programs that might permit Section 8 programs to be used to promote home ownership.
- The City will also look to adjust its housing programs as light rail is developed in order to ensure that the economic development, housing choice, and housing affordability impacts of light rail are fully realized.

***HUD Inventory – Project Based Section 8 (Legal Aid)***

*The Plan fails to mention the existence of subsidized rental housing located in low-income neighborhoods in the City of Cincinnati. Approximately 20 years ago, several subsidized rental projects were built in middle-income areas in the City of Cincinnati. These Section 8 new construction apartments expanded housing choice for low-income families, particularly minorities. Most of these rental developments continue to serve that function.*

*The City of Cincinnati should make a commitment to take all necessary and appropriate steps to preserve affordable rental housing stock that expands housing opportunities. The City lists preservation of project-based Section 8 as a strategy. Further discussion of the City's role with preservation of the HUD inventory is appropriate.*

- *The Plan should mention Cincinnatians for Affordable Housing (CAH) as a collaborator. CAH has convened a community-monitoring group to identify potential risks and mount advocacy efforts to preserve at risk properties. The City should play a significant role in this effort.*
- *The most obvious role for the City is to continue to provide rehabilitation funds to preserve inventory units. This will require the City to adopt priorities for allocation of those funds since it cannot provide funds to all projects at risk. A preference should be adopted for rehab proposals which will result in the preservation of HUD inventory units.*
- *The City has a role to play in brokering deals involving at-risk properties. The City has a wealth of information about the capacity of both non-profits and for-profits who would be interested in preserving project-based units. The City also can use its influence with the corporate community and financial institutions to involve them in preservation.*
- *The City should consider local preservation initiatives such as notice of prepayments and optouts to the City, CMHA and other selected entities. Other regulatory controls such as imposing a right of first refusal to certain groups could be explored. Advocacy with the State should also be undertaken by the City.*
- *Preservation should be added to the list of objectives, including some specific and measurable goals.*

***Comments from HOME***

*The City should try to get HUD to provide rental vouchers one for one for units in Section 8 conversion situations, not just for occupied units. Resources targeted to rental housing for the next few years should be used to retain the present stock of subsidized housing and not to develop additional units. It appears likely that changes in housing policy at the federal level will put many units in the City at risk of having their subsidies reduced or eliminated which in some cases could lead to them being sold or abandoned. The Plan should, therefore, call for the institution of a planning process which would set out sound criteria and provide for funding for those threatened existing projects that would give the most benefit to the City by continuing in the low-income inventory.*

City's Response: With respect to project-based Section 8, the City accepts many of the suggestions made by Legal Aid and HOME on this subject, but differs on others. The City has added Cincinnatians for Affordable Housing as a collaborator in the preservation effort. The City is willing to consider the role of brokering deals involving at-risk properties. The City has already discussed with HUD the regular provision of information from HUD sources on opt-outs and troubled properties. The City will work with other interested groups in an effort to get HUD to change its policy to provide for one-for-one replacement of project-based units in conversion situations, rather than replacement of occupied units only. The City agrees that criteria should be developed, or priorities established, for assisting project-based Section 8 at risk of conversion or default.

The City does not agree that its rental housing resources should be targeted exclusively to this effort, or that an automatic preference should be adopted for the preservation of HUD inventory units. First, the City has been responsive to the rehabilitation needs of Section 8 projects in the recent past, within the context of existing programs (i.e., Rental Rehabilitation and Housing Round). Secondly, there is no evidence of a large number of landlords in the Cincinnati housing market who are opting out of the program. Third, many Section 8 projects may be able to support private financing for rehabilitation or for sale to another owner. Finally, the City endorses case-by-case reviews in which consideration would be given to a number of factors, including building condition, management history, and location for purposes of housing choice.

The City will adopt preservation planning as an objective. The City will work with its current partners within the coalition for affordable housing and the City's Fair Housing Committee's subcommittee on subsidized housing to establish review criteria for interventions and the systematic monitoring of the status of the housing supply.



## Community Development

HUD uses the category of *Community Needs* to refer to any problems to be addressed with federal dollars that are not related to homelessness, special populations, or directly related to housing. In previous years, the City has identified the following programs as worthy of funding:

- Programs to promote economic development
- Programs to increase the skills of the workforce and access to jobs
- Programs to serve youth
- Programs that provide human services and that are in need of upgraded facilities.

### Vision

The City of Cincinnati includes diverse neighborhoods that offer opportunities and choices to all. The City's neighborhoods are dynamic, safe places where its citizens can live, work, and play.

### Needs

HUD recognizes nine categories of Community Needs. These include four areas that the City has in the past addressed with CDBG funds: Economic Development, Public Services, Public Facility Needs and Youth Programs. The areas of community need that the City will not be using CDBG funds to address include: Anti-Crime Programs, Infrastructure, Planning and Administration, Senior Programs, and Other.

The City has chosen not to set priorities among the nine need areas. Neither has it chosen to estimate the number of units of service that would be required to ameliorate the problems. The following table shows the estimated cost of fully addressing the problem areas that the City will address with CDBG funds.

HUD Table 2B

Community Needs	Estimated Dollars to Address
<b>Economic Development</b>	\$137,000,000
Rehabilitation of Publicly or Privately Owned Commercial Property	\$50,000,000
Land Acquisition/Disposition	\$25,000,000
Infrastructure Development	\$25,000,000
Building Acquisition, Construction, Rehabilitation	
Other Commercial/Industrial Improvements	
Direct Financial Assistance to For Profit Organizations	\$25,000,000
Technical Assistance	\$2,000,000
Micro-Enterprise Assistance	\$10,000,000
<b>Public Facilities</b>	
Public Facilities and Improvements (General)	\$10,000,000
Handicapped Centers	
Neighborhood Facilities	
Parks, Recreational Facilities	
Parking Facilities	
Solid Waste Disposal Improvements	
Fire Stations/Equipment	
Health Facilities	

Asbestos Removal	
Clean-up of Contaminated Sites	
Interim Assistance	
Non-Residential Historic Preservation	
<b>Public Services</b>	\$125,000,000
Public Services (General)	
Handicapped Services	
Legal Services	
Transportation Services	\$100,000,000
Substance Abuse Services	
Employment Training	\$25,000,000
Health Services	
Mental Health Services	
Screening for Lead-Based Paint/Lead Hazards	
<b>Youth Programs</b>	\$20,000,000
Youth Centers	
Child Care Centers	
Abused and Neglected Children Facilities	
Youth Services	\$20,000,000
Child Care Services	
Abused and Neglected Children	

#### Economic Development

The City is in constant competition with its suburbs, which can offer a plentiful supply of undeveloped land and cheaper office and retail space. Industrial and commercial development is easier at the region's periphery than at its core. The City has to contend with state policies that subsidize the cost of moving jobs to new development sites in the suburbs. Suburban developments are typically greenfields developments. In contrast, even after the City has acquired sites, in and of itself no small accomplishment, it then often faces the challenge of promoting development on brownfields, with the attendant costs of rebuilding aging infrastructure, demolition, and dealing with environmental hazards.

- The City is short of large sites that can be developed.
- Environmentally damaged land is a serious problem.
- Inadequate infrastructure in industrial areas can play a key role for companies that are considering expansion, often leading them to consider relocation instead.
- Older built-out urban cities such as Cincinnati have little vacant land available for development. Land assembly is often something private developers need assistance with.
- The physical impact of blight on a small neighborhood commercial district is evident much sooner than in large commercial or industrial areas.

#### Economic Development Needs of Small Businesses, Including Women-Owned and Minority-Owned Businesses

Potential small business developers in the central city face barriers involving the lack of assistance, lack of financing and discrimination. A 1993 study of the needs of the City's small and minority businesses identified:

- Difficulty securing working capital financing and equity investments
- No local active equity fund to serve the needs of small businesses
- A need for government assisted micro-loan programs to meet the demands of start-up companies for financing
- A need for a technical assistance clearinghouse, which would act as a "one-stop-shop" for small businesses in need of support services
- A need for broader utilization in the market segments and greater access to bid for City contracts
- Small businesses need information about the availability of public sector resources as well as the purchasing programs of private corporations
- A need for corporate mentoring programs for women-owned businesses

#### Workforce Development and Access to Jobs

The City's potential workforce includes a disproportionate share of the region's less well-off members. The City's resident workforce is less educated than the suburban workforce and is qualified for less skilled jobs. The poverty rate in the City of Cincinnati is 24.3 percent. There are 13 Cincinnati neighborhoods with poverty rates above 35 percent. The rate in the Empowerment Zone is 46.8 percent. Unemployment is similarly concentrated; there are 13 Cincinnati neighborhoods with unemployment rates higher than 13 percent in 1990.

Job Training Partnership Act (JTPA) programs are performance based, and thus reward providers that have the most success in job training and placements. Therefore, the tendency is to train those with the greatest potential for success. This *creaming* process leaves those most difficult to serve without training assistance. The City has attempted to fill this gap with several locally funded programs as well as several programs funded with CDBG funds.

#### Youth

Cincinnati's youth are concentrated in its poorest neighborhoods. The 1993 Annual Report of the Mayor's Commission on Children found that "the biggest single threat to the health and development of children in Cincinnati is poverty." The report points to the declining number of jobs that provide a living wage and the fact that many residents lack the skills and education needed to win such jobs as the major barrier to

overcoming poverty. The report recommended increased funding for job creation and skill development programs to raise the standard of living of poverty level households. Thus, the programs designed and controlled by Cincinnati to reduce the number of households with incomes below the poverty line have either job creation or skill development as their primary objectives.

The City collaborates with the Citizen's Committee on Youth (CCY) to provide counseling and mentoring services for youth in low-income neighborhoods, and provides year-round employment opportunities for in-school youth. CCY also provides summertime enrichment activities to youth at various sites throughout the City.

#### Public Facilities

Not-for-profit organizations that serve the human service needs of the population of the City sometimes have infrastructure needs that imperil their ability to provide service. These may include lead hazards.

#### Strategies

##### General Anti-poverty Strategies

The City will continue to collaborate with the Cincinnati Hamilton County Community Action Agency (CAA). Head Start programs, neighborhood development programs and emergency programs account for most of the eight to ten million dollars CAA expends annually in its anti-poverty effort. CAA also funds senior services, youth services, educational services, and special projects.

The Family Self-Sufficiency (FSS) program, administered by CMHA, is another important anti-poverty effort in the area. The purpose of FSS is to enable low-income families to achieve economic independence and self-sufficiency. Towards this end, Section 8 rental assistance is combined with public and private resources to provide the supportive services that enable families to achieve self-sufficiency.

##### Economic Development

The City of Cincinnati employs land aggregation through acquisition to develop areas specifically designed to attract new business investments in Cincinnati. This program attracts corporate offices, plant and facility consolidations and commercial, industrial or distribution firms into geographically defined areas identified by the City. When the City identifies land that might be suitable for development, it will develop it and seek out partners. Pre-development activity for these areas includes land assembly, demolition, relocation of businesses, and the design and construction of public improvements. The City will also promote and encourage actions to identify contaminated City property and implement cleanup projects. The Cincinnati/Hamilton County Port Authority for Brownfield Redevelopment and the Brownfield Community Advisory Committee identify and evaluate the potential for the redevelopment of brownfield properties.

Neighborhood business districts can benefit from investments in infrastructure and building renovations. The physical impact of blight on a small neighborhood

commercial district is evident much sooner than in large commercial or industrial areas. The loss of even one business in a neighborhood business district may result in a sharp decrease in the volume of business to the area and adversely impact adjacent businesses. The City will support neighborhood business districts by making infrastructure investments, including sidewalk treatment and lighting; facade improvement and awning programs which enhance the appearance and visually unify the area; the development of off-street parking, and the elimination or redevelopment of blighted buildings.

Inadequate infrastructure in industrial areas can play a key role for companies that are considering expansion, often leading them to consider relocation instead. Businesses need to be accessible and to have access to interstates and railroads in order to get their goods to market.

The City of Cincinnati will create jobs for low-income residents through the provision of loans or other forms of assistance to industry or commercial businesses throughout the City or to small or to neighborhood businesses.

The City will also use state and local tax incentives and infrastructure improvements to assist in the creation and retention of jobs for the City's low-moderate income residents and the expansion of the City's tax base.

The City will offer assistance to small business enterprises, with an emphasis on minority and women businesses.

#### Workforce Development and Access to Jobs

The City will make a concerted effort to collaborate more closely with the Hamilton County Department of Human Services, which has surplus funds that can be used to advance welfare reform. More generally, the City should invest in workforce development. In addition, the City will:

- Promote the coordination of efforts to improve community transportation from housing to jobs.
- Promote partnerships with the schools.
- Promote workforce development through career planning services, services to dislocated workers, older workers and workers with minimal job skills.
- Help place residents in jobs.
- Provide limited transportation services for unskilled inner-city residents to jobs in the suburbs.
- Provide job readiness training and job placement services to low-income residents ready for immediate employment.

- Support programs that recruit and train minorities and women for employment in the construction industry.

## Objectives

The City will fund programs to accomplish the following objectives. The first three of the objectives will be coordinated through the Human Services Advisory Committee and administered by the Department of Neighborhood Services. The last objective will be the responsibility of the Employment and Training Division. The others will be the responsibility of the Department of Economic Development.

HUD Table 2C Other  
Community Development  
Objectives

	2000 Target	5 Years Targets
▪ Provide job training and work experience for youth (Youth)	205	1,025
▪ Provide social services and constructive activities to at-risk children and youth (Youth)	59,200	296,000
▪ Provide funding assistance to renovate or construct facilities for the delivery of public services (Public Facilities)	4	15
▪ Provide economic education and basic banking services as well as access to credit for residents and businesses (People)	1,500	7,500
▪ Promote industrial and commercial redevelopment by assembling land and/or improving site and infrastructure conditions (Businesses)	4	6
▪ Encourage microenterprises and small business development within the City, with an emphasis on minority and women-owned enterprises (Businesses)	333	1,401
▪ Provide public improvements to support revitalization of neighborhood business districts (Businesses)	187	495
▪ Provide job training and placement opportunities for adults and employment supportive services including transportation to jobs (People)	1,915	9,575

Community  
Planning Input

In the community planning session on anti-poverty strategies and economic development, which occurred as part of the development of the preliminary plan, the following comments were made. While some of these comments were incorporated into the plan, the inclusion of a comment in this list does not mean that the

recommendation or comment has been adopted by the City of Cincinnati as part of the plan.

*There needs to be emphasis on laborers not in the work force, the discouraged worker and underemployed. They need training.*

*Inequality in wages is a problem. Entry-level jobs do not keep pace with inflation. Often these jobs are part-time and offer few if any fringe benefits.*

*Poor women often have to work two jobs.*

*Entry level or first jobs will not sustain people. Other resources are required, such as Medicare.*

*There has been a shift to temporary employees from full-time employees.*

*People with part-time jobs at minimum wage often move in and out of the labor force; they do not acquire job skills or discipline.*

*Small businesses are sources of employment but these businesses cannot afford City rents so they move out to the suburbs. The unemployed need support systems – childcare, transportation, etc.*

*The poor quality of urban schools is being ignored.*

*Childcare affects persons of all incomes, especially low income.*

*The City's plan should be more neighborhood-based and assistance should be targeted, as with the Empowerment Zone. More emphasis should be placed on neighborhoods.*

*There are bulldozers in the West End; we need to solve people problems, not just level buildings.*

*Small businesses are moving out of the City. We need County participation and resources to deal with these problems.*

*City's neighborhood business districts are not shopping districts. The City has to help convert buildings to small business use, not just retail use. They will never again support much retail.*

*In neighborhood business districts, the businesses do not always represent the demographics of the neighborhood. There need to be increases in the number of minority-owned businesses in minority neighborhoods.*

*With respect to economic education and access to credit, this should not just be in Over-the-Rhine, but in other neighborhoods as well.*

*A site preparation cost that has not been mentioned is the expense of hauling away the contaminated soil, old foundations, etc.*

*Need to promote minority and women-owned businesses, but use race and gender-neutral language. Other disagreed and said it is important to emphasize minority and women-owned business.*

*Job training for youth is important but they also need entrepreneurial training*

*Transportation to jobs is a needed. East-west access to jobs is very limited.*

*The City should foster the adaptive use and reuse of buildings within the neighborhood business districts.*

*There needs to be private sector linkages, like Cincinnati Works has, between people needing jobs and companies. Such programs exist in Portland and Minnesota.*

*Talk with building and fire inspectors to get data on neighborhoods; they are in the neighborhoods every day.*

*Should the plan include anti-crime and public safety problems? Several people said "yes." Others agreed that crime is important, but that important housing resources should not be diverted to a problem for which there is a lot of funding.*

*Persons with disabilities are always very poor.*

*There seems to be resistance in the City to integrating activities. Where is the coordination of different funding sources and different departments?*

*The overall level of need in the City does not accurately portray the real pockets of poverty and need. The distress numbers are actually diluted by the overall citywide data. Instead of emphasizing the citywide relatively good news, you should emphasize the high levels of distress in certain areas.*

*Can agencies using these federal funds be required to pay livable wages?*

*Concern was expressed about reductions in future HUD budgets.*

*Concern was expressed about people being forced off assistance and the general problem of welfare reform.*

*People should be planning now the revitalization of areas near light rail stations*

*Can some funds be used for planning, monitoring and performance review?*

These comments were made in the planning session on neighborhood revitalization. While some of these comments were incorporated into the preliminary plan, the inclusion of a comment in this list does not mean that the recommendation or comment has been adopted by the City of Cincinnati as part of the plan.



*City has had CDBG funding for 25 years but the impact is hard to see because the funds have not been used strategically. These funds should be used to solve problems of low-income communities. Need to think more strategically and run coherent programs that work together.*

*An important element of a comprehensive plan is civic leadership – need to encourage people to act in their own behalf without depending on City or federal funds. Civic leadership can be promoted via grass roots initiatives, helping communities recognize assets, facilitating partnerships, and recruiting leaders.*

*Empower people to go after what they want – support people to grow rather than serve people from above.*

*Coordination of efforts is needed. The City is doing some of this but not enough. Coordination of activities at the neighborhood level is also needed. The Cincinnati Neighborhood Action Strategy (CNAS) teams meet immediate needs, but they are reactive, not pro-active, and are not involved in planning.*

*The City is not organized to do true planning. There are separate departments with no coordinating mechanism. The City's CDBG program dollars are spent in citywide programs and are not targeted geographically. There is no room for trying new approaches.*

*Some of the City's existing Neighborhood Business Districts (NBD) will never be vital. The NBD funding process needs to be more focused. It is currently spending money to appease neighborhoods and support special interests.*

*With respect to the HOPE VI projects, HUD has done something great. The projects open up neighborhoods to market housing. They help the neighborhood and help the City. They should include social services and recreation. However, opening up the housing market regionally requires transportation.*

Citizen Reaction to Preliminary Plan

No reactions to this portion of the Plan were received.

## Monitoring

Current Monitoring Procedures

Citizens are encouraged to comment on the performance of city and nonprofit agencies in implementing Consolidated Plan programs and projects and in meeting program objectives.

While the Consolidated Plan documents the proposed use of funds, the Grantee Performance Report (GPR) for CDBG identifies the progress and performance of projects, programs and services funded during the prior program year. Annual reports for the HOME Program are also available. The GPR is available in early March annually. At the beginning of March, the Office of Budget and Evaluation will publish

a notice in the City Bulletin and in a general publication newspaper that the performance reports are available and locations where they may be reviewed.

Citizens may have reasonable and timely access to information and records relating to Cincinnati's Consolidated Plan and its use of funds for the preceding five years. Consolidated Plan program history, in the form of previous Comprehensive Housing Affordability Strategy (CHAS) reports, CDBG Consolidated Plans, and CDBG Grantee Performance Reports can be reviewed in the Office of Budget and Evaluation, Rm. 142, City Hall, between the hours of 8:00 A.M. and 5:00 P.M., or by calling 352-3232.

Complaints from citizens concerning Consolidated Plan activities, amendments or performance should be directed to the Community Development Administrator in the Office of Budget and Evaluation, Room 142, City Hall. Citizen complaints submitted in writing will be answered within 15 working days where practicable.

#### Administrative Monitoring

The Office of Budget and Evaluation of the Finance Department administers the City's Consolidated Plan grants. Administration includes the following functions:

- Reviewing all proposals for funding at the budget phase for eligibility with grant program requirements.
- Reviewing grant budgets in their entirety for compliance with program caps (CDBG) and program set asides (HOME CHDO requirements).
- Reviewing all activities at the implementation phase for compliance with grant requirements (with Law Department).
- Monitoring activities to ensure commitment of funds in a timely manner, in particular the Emergency Shelter Grants and CHDO commitments for HOME funds.
- Monitoring ongoing expenditures during the course of the program year to ensure program caps are not exceeded and that the CDBG program as a whole is in compliance with national benefit standards.
- Monitoring achievement of plan goals and objectives through periodic and annual reports and through the budget review process with citizen advisory board.

#### Subrecipient Monitoring

The City has formal subrecipient monitoring procedures that involve the following elements:

- An audit requirement based on a risk assessment (for subrecipients of less than \$300,000 in federal funds).

- City staff is assigned to monitor subrecipient contracts.
- Written monthly activity reports are required.
- Documentation for all vouchers is required.
- Frequent communication with subrecipient, including telephone contacts, routine site visits, with file reviews at least annually and a formal site visit with complete compliance reviews once every 24 months.

#### Technical Assistance

Community groups may receive assistance with proposals for potential Consolidated Plan program funding through the following resources. All requests that fall outside of the human services or neighborhood business district funding process should be submitted no later than May 15 annually in order to be considered in department funding requests.

##### Neighborhood Services Department

Susan Utt – COC, HOPWA, Housing (including lead abatement) - 352-6117

Carol Brown – Human Services -352-6293

Gerard Hyland – Housing Round

##### Economic Development Department

Toni Selvey-Maddox, 352-3784

Susan Paddock, 352-3448

##### Employment & Training Division

Yudora Whitfield, 357-2843

##### General Eligibility Questions

Gerry Torres, 352-6272

John Dietz, 352-1563

Lois Logan, 352-6264

#### Recommended New Monitoring Procedures

As discussed in Part 2, the City of Cincinnati should implement a fuller and more open process of evaluating the performance of programs funded under this plan, and these monitoring and evaluation procedures should take place early enough in the funding cycle to influence programming in subsequent years. Another general strategy described in Part 2 concerned the need to do a better job of targeting. The Community Development Advisory Board should make recommendations to the City about areas in which programming weak or non-existent. The City can then either charge a City department with programming responsibility or release Requests for Proposals (RFP) so that organizations can submit bids to offer programming.

The City should examine how the Continuum of Care process relates to and intersects with the allocation process for ESG funds and other human services dollars allocated by the City and resolve a few of the remaining problems in the coordination of these

efforts. To the extent necessary, the City should do this in cooperation with Hamilton County. The joint COC process should be continued, but the City does allocate additional human services dollars, and what is at issue is how that extra spending of the City will be (or should be) coordinated with the COC process, and what role the City (and County) should play in monitoring and certifying the work of the COC process above and beyond what it does now.

#### Overcoming Gaps in Institutional Structures

The City has demonstrated its willingness to enter into partnerships with other organizations when existing institutional resources are inadequate to implement part of its strategy for housing and community development. Some examples of this willingness are as follows:

- The City recognized the opportunities afforded by HOPE VI, not merely to upgrade public housing in the West End neighborhood, but to create new ownership opportunities and to increase the economic diversity of the neighborhood. The City therefore strongly supported CMHA's two HOPE VI applications, including making significant financial commitments.
- The City collaborated with Hamilton County for a joint city/county Continuum of Care planning and allocation process.
- In order to ensure that the needs of microenterprises, retailers, neighborhood organizations and other private sector interests were being addressed in its disbursement of economic development dollars, the City agreed to a process whereby Cincinnati Neighborhood Business Districts United (CNBDU) plays a significant role in the allocating of development dollars for neighborhood business districts.

The City needs to continue to be open to such partnerships. One problem that has already been identified for the near future concerns the potential loss of project-based Section 8 subsidies in Hamilton County. Thus, as part of the strategy presented in the next chapter, the City will help develop an alliance of organizations with a stake in this issue, including Housing Opportunities Made Equal, the Legal Aid Society, Cincinnatians for Affordable Housing, the Cincinnati Metropolitan Housing Authority, and Hamilton County.

Beyond the issue of Section 8 subsidies, the Community Development Advisory Board and city staff will consider the issue of institutional gaps when they make recommendations for better programming.

## Action Plan

### *Funding Plans for 2000*

This part of the plan describes the specific programming that will be funded in 2000 in order to implement the strategies and accomplish the objectives described in Part 3. Not every objective will be addressed in the *first* year of the plan. Detailed program descriptions for the first year are listed in alphabetical order by name of the program.

### Overview of Funding for 2000

#### Homeless

Objective 1: Support operations and essential services of current shelters and transitional housing providers at locations convenient and accessible to the homeless population.

Program	Indicator	2000 Goal	Five Year Goal
Caracole House	Organization	1	
Bethany House	Organization	1	
Alice Paul House	Organization	1	
Interfaith Hospitality Network	Organization	1	
Drop In Center	Organization	1	
Franciscan at St. John's	Organization	1	
Chabad House	Organization	1	
Lighthouse Youth Services	Organization	1	
Tom Geiger Guest House	Organization	1	
Second Mile Ministries	Organization	1	
	Totals	10	42

Objective 2: Renovate emergency shelters and transitional housing facilities.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Salvation Army	Public Facility	1	
Anna Louise Inn	Public Facility	1	
	Totals	2	14

Objective 3: Improve operations in the network of COC providers. Assess and modify the Quick Access System to better utilize the existing units (June 2000). Design a method for adjusting to seasonal shifts in homelessness by creating capacity for seasonal emergency beds (January 2001). Establish a uniform set of data and methods for collecting homeless data (July 2001). These are planning objectives to be carried out by the joint Cincinnati/Hamilton County Continuum of Care.

Objective 4: Provide Shelter Plus Care or other permanent housing for homeless persons with disabilities.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Caracole, Inc.	Persons Homeless		
Excel	Persons Homeless		
Lighthouse	Persons Homeless		
Talbert House	Persons Homeless		
Totals		283	400

Objective 5: Renew eligible, evaluated Supportive Housing Program (SHP) services-only or services-included assistance. The programs to be renewed will be identified during the Continuum of Care Process in 2000.

Objective 6: Create Supportive Housing Program at Franciscan Home Development.. No programming in year 2000.

Objective 7: Develop new or rehabbed service-enriched housing units. No programming in year 2000.

Objective 8: Develop new or rehabbed scattered-site transitional housing units. No programming in year 2000.

Objective 9: Create one new Continuum of Care services-only program annually. New program will be developed through the City of Cincinnati/Hamilton County Continuum of Care process.

Special  
Populations

Objective 1: Provide operational support for 20 beds of congregate, transitional housing for persons with HIV/AIDS.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Caracole House	Persons with Special Needs	20	100

Objective 2: Provide direct services for persons with HIV/AIDS, including housing assistance, supportive services and linkages to medical support.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
AIDS Volunteers of Cincinnati	Persons with Special Needs	300	1500
Northern Kentucky Independent District Health Department	Persons with Special Needs	50	250
Totals		350	1,750

Objective 3: Provide short-term, rent, mortgage or utility assistance to persons with HIV/AIDS.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
AIDS Volunteers of Cincinnati	Persons with Special Needs	190	950
Northern Kentucky Independent District Health Department	Persons with Special Needs	230	1,150
Totals		420	2,100

Objective 4: Create an improved housing information system for use in housing and case management for persons with HIV/AIDS.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
AIDS Volunteers of Cincinnati	Organizations	8	8

Objective 5: Assist two organizations provide improved housing information services for persons with HIV/AIDS to the African-American community and substance abuse providers.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
AIDS Volunteers of Cincinnati	Organizations	1	1
Caracole	Organizations	1	1
	<b>Totals</b>	<b>2</b>	<b>2</b>

Objective 6: Upgrade the facilities of two service providers who serve persons with HIV/AIDS.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
AIDS Volunteers of Cincinnati	Public Facility	1	1
Caracole	Public Facility	1	1
	<b>Totals</b>	<b>2</b>	<b>2</b>

Objective 7: Provide planning support to organizations in Northern Kentucky in developing housing solutions for single men with HIV/AIDS.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Northern Kentucky Independent District Health Department	Organizations	1	1

Objective 8: Provide housing counseling services to frail elderly persons.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Housing Counseling Services	Persons with Special Needs	80	400

Objective 9: Provide home repair services to frail elderly persons.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Housing Maintenance Services	Persons with Special Needs	80	400



Objective 10: Provide home repair and accessibility upgrade services to persons with disabilities.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Housing Maintenance Services	Persons with Special Needs	40	200

Objective 11: Help one service organization a year make significant upgrades to its facilities.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Talbert House	Public Facility	1	5

#### Housing

Objective 1: Develop new and rehabilitated housing units suitable for home ownership by persons with low and moderate incomes.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Housing Round Homeowners Homeownership/Neighborhood Revitalization	Housing Units	55	220
Homesteading	Housing Units	5	25
Lincoln Court	Housing Units	35	175
Laurel Homes	Housing Units	0	100
Totals	Housing Units	0	150
		95	670

Objective 2: Assist low income and moderate-income renters in making the transition to owner-occupancy.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Down Payment Assistance	Households	70	350
Housing Counseling Services	Households	300	1,500
Totals	Households	370	1,850

Objective 3: Help low-income homeowners maintain ownership of their homes.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Homeowner Rehabilitation Loan Program	Housing Units	70	350
Housing Maintenance Services	Housing Units	500	2,500
Housing Counseling Services	Housing Units	200	1,000
Totals	Housing Units	770	3,850

Objective 4: Develop rental units for very low-income and low-income households.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Housing Development Round Renters	Housing Units	70	300
Rental Rehabilitation Program	Housing Units	120	600
Lincoln Court	Housing Units	0	400
Laurel Homes	Housing Units	0	435
Totals	Housing Units	190	1,735

Objective 5: Provide supportive services for very low-income and low-income renters that will enable them to find and keep affordable units.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Central Parkway Towers Rental Assistance	Households	50	250
Tenant Assistance (Relocation)	Households	2,500	10,000
Code Enforcement Relocation	Households	150	600
Tenant Representation	Households	3,500	15,000
Totals	Households	6200	25,850

Objective 6: Promote fair housing.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Fair Housing Services	Households	1,750	7,000

Objective 7: Develop and support comprehensive efforts to revitalize neighborhoods while also expanding economic opportunities.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
NDC Support	Organizations	8	40
Technical Assistance to NDC's	Organizations	27	100
Over-the-Rhine Comprehensive Plan	N/A		
<b>Totals</b>		<b>35</b>	<b>140</b>

Objective 8: Reduce blighting influences in residential neighborhoods.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Concentrated Code Enforcement	Housing Units	5,000	20,000
Hazard Abatement/Barricade	Housing Units	175	600
Neighborhood Gardens	People	1,275	5,000
Housing Round	Housing Units	0	50
<b>Totals</b>		<b>6,450</b>	<b>25,650</b>

Other Community  
Needs

Youth Objective 1: Provide job training and work experience for youth.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Youth Employment Initiative	Youth	140	700
Job Training & Litter Control	Youth	20	100
Project IMPACT Over-the-Rhine	Youth	45	225
<b>Totals</b>	<b>Youth</b>	<b>205</b>	<b>1025</b>

Youth Objective 2: Provide social services and constructive activities to at-risk children and youth.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Back on the Block	Youth	55,000	275,000
Juvenile Delinquency Prevention	Youth	4,000	20,000
It Takes a Village	Youth	200	1,000
<b>Totals</b>	<b>Youth</b>	<b>59,200</b>	<b>296,000</b>

Public Facilities Objective 1: Provide funding assistance to renovate or construct facilities for the delivery of public services.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Boys & Girls Club	Public Facilities	1	
Crossroads Child Development Center	Public Facilities	1	
Victory Neighborhood Services Avon Center Child Care Facility	Public Facilities	1	
C.C.A.T.	Public Facilities	1	
Totals	Public Facilities	4	15

Economic Development Objective 1: Provide economic education and basic banking services as well as access to credit for residents and businesses.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Credit Union Services - OTR	Persons	1500	7500

Economic Development Objective 2: Promote industrial and commercial redevelopment by assembling land and/or improving site and infrastructure conditions.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Brownfields Redevelopment	Businesses	2	4
Madisonville Corsica Hollow	Businesses	2	2
Totals		4	6

Economic Development Objective 3: Encourage microenterprises and small business development within the City, with an emphasis on minority and women-owned enterprises.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Small Business Loan Fund	Businesses	7	35
Cincinnati Business Incubator	Businesses	7	21
Small Business Technical Assistance Program	Businesses	2	10
Neighborhood Small Business Division Operations	Businesses	12	60
Jobs for People	Jobs	4	20
Small Business Enterprise Program	Businesses	250	1,000
Micro Loan Program	Businesses	3	15
Findlay Market Microenterprise Program	Businesses	48	240
Totals		333	1,401

Economic Development Objective 4: Provide public improvements to support revitalization of neighborhood business districts.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
O'Bryonville Streetscape Ph.3	Businesses	17	
OTR Vine St. Façade Program	Businesses	21	
Columbia-Tusculum Streetscape Improvements	Businesses	5	
W. End Linn St. Revitalization	Businesses		
Madisonville New Life Urban Redevelopment Phase I	Businesses	26	
E.Price Hill Façade Improvement Program	Businesses	15	
OTR Main St. Streetscape Improvements	Businesses	19	
NBD Property Holding Expenses	Businesses	4	
Findlay Market Phase III & IV	Businesses	80	120
Totals		187	495

Economic Development Objective 5: Provide job training and placement opportunities for adults and employment supportive services including transportation to jobs.

<b>Program</b>	<b>Indicator</b>	<b>2000 Goal</b>	<b>Five Year Goal</b>
Employment Initiatives (placements)	People	600	3,000
Career Resource Center (placements)	People	1,275	6,375
PREP, Inc. (placements)	People	40	200
<b>Totals</b>		<b>1,915</b>	<b>9,575</b>

## Program Specific Requirements

ESG matching funds for 2000 are provided by the homeless provider agencies (\$3,718,600) and by additional grants from City General funds (\$389,500).

HOME funds will be matched through cash provided by the City's Capital Investment Program. An appropriation of \$550,000 is scheduled in each year from 1999 through 2004.

The City of Cincinnati does not use its HOME funds for forms of investment other than those described in 92.205(b), which include interest and non-interest bearing loans, deferred payment loans or grants, interest subsidies, or loan guarantees.

In order to comply with the provisions of 24 CFR 92.254 regarding the sale of the home within the period of affordability, the City will impose a deed restriction on the property for which the first time homeowner was assisted. If the owner sells the property before the expiration of the period of affordability, the HOME investment will be repayable to the City, but will be reduced pro rata based on the time the home purchaser owned and occupied the unit during the required affordability period.

The City of Cincinnati does not plan to use HOME funds to refinance existing debt secured by multifamily housing being rehabilitated with HOME funds.

## Program Descriptions

Detailed descriptions of each program to be funded in 2000 follow. The programs are listed in alphabetic order by name of the program.

HUD Table 3